

A. South Florida Water Management District's Comments.

1. Comment 1:

Section K and M include maps of the current (2025) areas served for BCWWS. It should also include future areas served maps (2035) if there are proposed changes to the areas served within the work plan period. If no changes are proposed, the work plan should state there are no planned changes to the existing areas served.

Broward County Response:

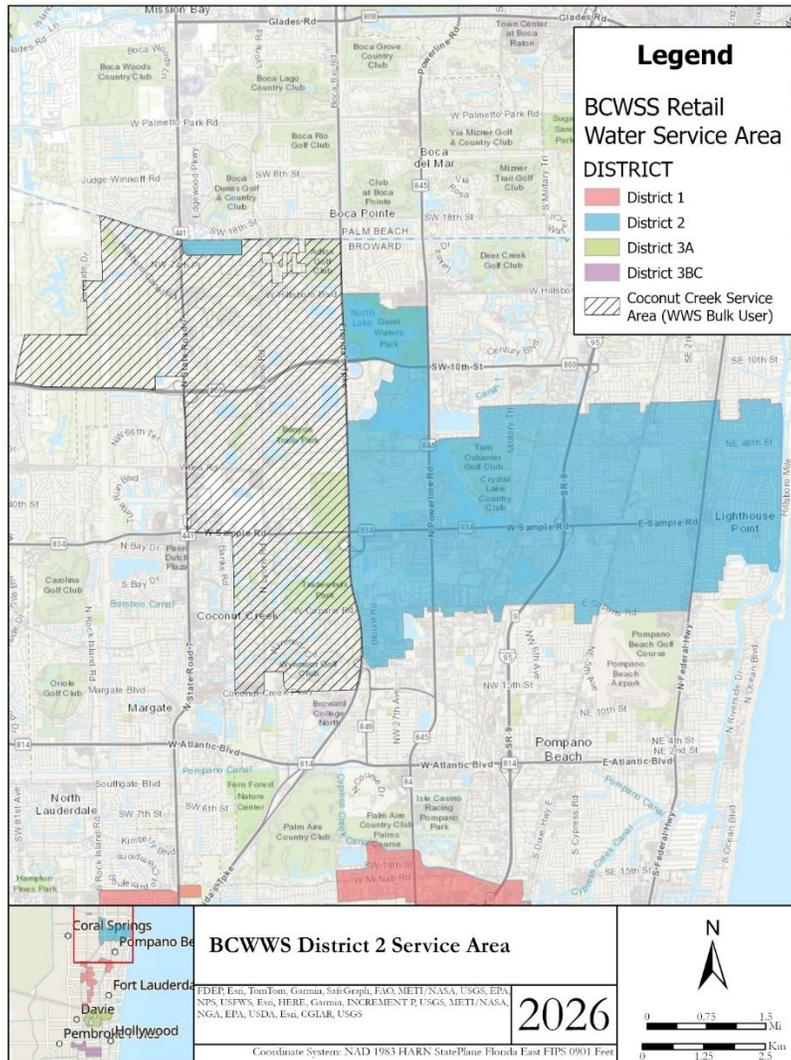
Statement was added to end of section K that reads “In the future, all current service areas are projected to remain unchanged as there are no plans for annexation or detachment.”

2. Comment 2:

The District 2 Service Area maps (Figures WS5 and WS7) are missing significant areas west of the Turnpike when compared to the areas served map in the current Lower East Coast Water Supply Plan. Please verify the areas served and update the figure if needed.

Broward County Response:

The maps noted service areas of Broward County WWS, the area in question is the service area of Coconut Creek which is a bulk retail customer. Figure WS7 which shows District 2 has been updated with a shaded region denoting the Coconut Creek service area as a bulk retail customer.



3. Comment 3:

Section N. Conservation: The section focuses primarily on existing programs with limited discussion of future enhancements. It is recommended that a brief forward-looking statement be included describing how conservation programs may be expanded or refined over the planning horizon to help offset future demand growth, consistent with Section 163.3177(6)(c)3, F.S.

163.3177 Required and optional elements of comprehensive plan; studies and surveys.—

(6) In addition to the requirements of subsections (1)-(5), the comprehensive plan shall include the following elements:

(c) A general sanitary sewer, solid waste, drainage, potable water, and natural groundwater aquifer recharge element correlated to principles and guidelines for future land use, indicating ways to provide for future potable water, drainage, sanitary sewer, solid waste, and aquifer recharge protection requirements for the area. The element may be a detailed engineering plan including a topographic map depicting areas of prime groundwater recharge.

3. Within the local government's jurisdiction, for any development of more than 50 residential lots, whether built or unbuilt, with more than one onsite sewage treatment and disposal system per 1 acre, the element must consider the feasibility of providing sanitary sewer services within a 10-year planning horizon and must identify the name and location of the wastewater facility that could receive sanitary sewer flows after connection; the capacity of the facility and any associated transmission facilities; the projected wastewater flow at that facility for the next 20 years, including expected future new construction and connections of onsite sewage treatment and disposal systems to sanitary sewer; and a timeline for the construction of the sanitary sewer system. An onsite sewage treatment and disposal system is presumed to exist on a parcel if sanitary sewer services are not available at or adjacent to the parcel boundary. Each comprehensive plan must be updated to include this element by July 1, 2024, and as needed thereafter to account for future applicable developments. This subparagraph does not apply to a local government designated as a rural area of opportunity under s. [288.0656](#).

Broward County Response:

While Section 163.3177(6)(c)3 does not address offsetting future demand growth for potable water, Broward County promotes conservation in numerous ways. Several statements have been added showing many programs have been renewed to continue through the next 5 year interlocal agreement cycles:

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Water Use Efficiency/Conservation

Broward County has implemented diverse water conservation initiatives to protect the quantity and quality of Broward's existing and future water resources to help meet our current and projected demands. Consistent with this objective, the county has implemented a broad set of water conservation programs under the Natural Resources Division (NRD) Water Conservation Section. This section is focused on creating campaigns designed to produce long-term demand reductions along with improvements in water quality. These programs, targeted at various user groups, include: NatureScape Broward, Water Matters Day, Conservation Pays, NatureScape Irrigation Service (NIS), Residential Irrigation Rebate Program (RIRP), and the NatureScape Broward School Board Environmental Partnership Agreement. The overall goal of the Water Conservation Section programs are to reach a sustained minimum 10% reduction in water use over 20 years. Further support for water conservation is found in other conservation-oriented measures, including changes to the Florida Building Code for cooling towers and high efficiency plumbing devices, year-round irrigation measures, model irrigation codes, Climate Action Plan initiatives, and other water conservation policies and regulations. The water conservation initiatives are listed below.

Conservation Pays Program - This effort was launched in 2011 in collaboration with 18 municipal and water utility partners to provide a coordinated regional campaign focused on water conservation and the distribution of rebates and other incentives. Rebate dollars are used for the replacement of older, inefficient toilets in addition to the distribution of other water-saving fixtures and devices such as aerators and commercial pre-rinse spray valves. A consistent marketing and media campaign advances water conservation efforts as part of the Board of Commissioners' value of encouraging investments in renewable energy, sustainable practices, and environmental protection. Additional Commission support is promoted by the goal to increase water quality protection efforts and lead creative approaches to water storage and aquifer recharge, as well as diversification of water supplies regionally. To date, the program has saved more than two billion gallons of water in Broward County. The partnership will be pursuing its 4th 5-year ILA in 2026 that will provide water conservation opportunities for Broward residents and businesses through 2031.

NatureScape Irrigation Services - Launched in 2005, the NIS is implemented by the RED/NRD Water Conservation Section with cost-share provided by BCWWS and 17 local water utilities. The program targets large water users, including government facilities, parks, schools, and homeowner associations, where the greatest potential exists for significant water savings. To date, water savings exceed one and a half billion gallons with over 4,000 irrigation system evaluations. Best management practices that encourage the 'right plant in the right place' and smart irrigation help to promote water conservation messaging that adds to long-term water savings. In 2025, the NIS program entered into its 5th 5-year ILA, provisioning opportunities for commercial and residential water conservation in irrigation systems through 2030.

NatureScape Broward Program - Launched in 2003, NatureScape Broward promotes water conservation, water quality protection, and the creation of wildlife habitat through Florida-friendly landscape practices that encourage the prudent use of water resources through planting of native, non-invasive and other drought-tolerant plants. Broward was the first county in the U.S. to be certified under the National Wildlife Federation's Community Wildlife Habitat program and is celebrating its 20th consecutive year of certification, the only County in the nation to achieve

this landmark. In addition, there are 16 certified and 11 registered municipalities and over 5,500 landscapes that have been certified to date. Leveraging funds from the County's Tree Trust Fund, the NatureScape Broward program will be working with community partners to bring tree giveaways to neighborhoods throughout the County, in addition to continuing providing over 2,500 plants at its annual Water Matter Day event.

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School educational programs – The County regularly promotes water conservation in the schools through classroom programs and teacher and staff trainings. During the 2023-2024 school year, County staff distributed mini grants to youth as a part of the Bloomberg Project's Youth Climate Action Fund, including awards to schools who planted native trees and native butterfly gardens to help conserve water on their campuses. In 2026, the Water Conservation section will be pursuing its 4th multi-year agreement with Broward County Public Schools (BCPS), providing school water audits, tree plantings, and water conservation training for BCPS students, custodial staff, and teachers.

Media campaigns – The Conservation Pays program promotes indoor water conservation through several media campaigns each year. A recent campaign, "Summer of Savings" received 64,000+ total impressions, driven by vibrant social media posts that emphasized water and cost savings through the adoption of water-efficient bathroom fixtures, effectively engaging participants and providing an exciting incentive: the chance to win a \$250 gift card. Future campaigns include an influencer series on Water Heroes, digital-led campaigns in form of short-form videos and geo-targeted and interest targeted ads, and in-person and digital promotions of new brand ambassador Water Wise Will.

Informative billing – The Conservation Pays program provides utility partners with blurbs to include in its billing, as well as digital graphics and content to include in their e-newsletters. Partners are also able to reference a recently added blog that posts on a monthly basis on topics such as Water Conservation 101 and Water Conservation Checklists for the holidays throughout the year.

Training staff and associates at facilities and operations that provide irrigation and landscaping materials, services, and supplies – The

NatureScape Irrigation Services provides training to irrigation industry professionals on an annual basis on developments in water-saving devices. In addition, through the Environmental Partnership with Broward Schools, training is provided to facility managers on ways to save water. The NatureScape Irrigation Services program also creates award-winning YouTube shorts that help inform the public about water conservation best practices.

Florida-Friendly Landscaping™ is promoted through the NatureScape Broward program which works with Broward communities, garden clubs, and homeowner's associations to promote Florida-friendly™ landscaping and awards Emerald awards to a select group of homeowners/businesses/municipalities that exemplify excellent landscapes.

Workshops and exhibits – The County regularly offer workshops to promote water conservation and annually promotes water conservation to residents at Broward Water Matters Day, an event in March which draws annual attendance of approximately 4,000 residents.

Landscape design and irrigation education for residents is also promoted at Water Matters Day and through quarterly NatureScape meetings.

B. South Florida Water Management District's Advisory Comments.

1. Advisory Comment 1:

The proposed amendment revises Policy WM2.1 to state that the Water Supply Facilities Work Plan (WSFWP) “guarantees” water supply facilities and requirements needed to serve current and future development within the County’s water service area. We do not agree that this characterization is accurate or consistent with the purpose and function of a WSFWP. Specifically, the WSFWP itself does not, and cannot, guarantee the provision of water availability to serve a growing demand. A WSFWP is a planning and coordination document intended to demonstrate consistency between a local government’s comprehensive plan, the applicable regional water supply plan, and the capital planning efforts of water suppliers. It identifies planned projects, funding strategies, and implementation timeframes that are intended to meet projected demands over the planning horizon.

Broward County Response: A change to Policy WM2.1 item 4 is proposed that replaces the word *guarantees* with *contemplates*.

POLICY WM2.1 Broward County hereby adopts by reference the 2025 Broward County Water Supply Facilities Work Plan (WSFWP), dated ~~April 21, 2020~~ and included as (see Attachment A of the Water Management Element), that, at a minimum:

1. Provides for a a planning period of not less than 10 years;
2. Requires updates every five (5) years or within 18 months after the South Florida Water Management District governing board approves its Lower East Coast Water Supply Plan;
3. Addresses development and building of public, private, and regional water supply facilities, including development of alternative water supplies that are identified in the Broward County Comprehensive Plan's Water Management Element;
4. ~~The WSFWP addresses issues that pertain to~~ Guarantees Contemplates water supply facilities and requirements needed to serve current and future development within the County's water service area;
5. ~~The County shall review and update the WSFWP at least every 5 years, within eighteen (18) months after the adoption of an update to the SFWMD LEGRWSP. Any changes to occur within the first 5 years of the WSFWP shall be included in the~~ Achieves annual Capital Improvements Plan update to ensure consistency between with the Water Management Element and the Capital Improvements Element;
6. Endeavors to cooperatively plan with local governments, public and private utilities, regional water supply authorities, special districts, and water management districts for the development of multijurisdictional traditional and alternative water supply facilities to meet projected demands.

2. Advisory Comment 2:

District staff have observed a recent trend of utilities with lime softening treatment systems proposing projects to convert to Ion Exchange or Nanofiltration treatment systems to address PFAS drinking water standards. The plan does not mention having water treatment technology to remove PFAS compounds. The removal of PFAS compounds involves a higher treatment loss than conventional lime softening treatment technology, resulting in a need to increase the raw water withdrawal. Utilities should consider the increased raw water demand due to advanced treatment technology to remove PFAS chemicals. If this type of treatment system conversion is planned during the 10-year work plan period, the planned project information

(identifying treatment capacities, timelines, and capital costs) and any effects on demands for raw water and allocations should be included in the work plan.

Broward County Response:

When the original document was drafted the County was still gathering information and testing for PFAS. Since then, the County has performed its required PFAS testing, completed a white paper, and solicited a consultant to assist with next steps. The following revisions have been made to the BCWWS WSFWP regarding PFAS. Please note the planning report is available for review by the SFWMD staff and the public upon request.

U. PFAS

PFAS (Per- and Polyfluoroalkyl substances) are synthetic chemicals widely used in commercial and industrial applications. Over time, these uses have led to increasing concentrations of PFAS in the environment across the United States. Recent studies indicate that some PFAS compounds are likely carcinogenic, prompting the EPA to finalize regulations for a subset of these chemicals.

BCWWS testing detected PFAS in both raw and finished water at our treatment plants. To address compliance with the new regulatory limits, the County engaged a consultant to evaluate treatment alternatives. An initial report, completed in April 2024, concluded that advanced PFAS treatment would not cause permit shortfalls within our current allocation windows for the next 20 years. Allocation limits may only become a concern around 2055.

BCWWS also holds 5 MGD of C-51 allocations reserved for population growth, which can help offset potential future shortfalls from advanced PFAS treatment. Additionally, BCWWS has approved design and construction projects and allocated the necessary capital funding to ensure compliance with EPA regulations within the required timeframes. The timeline for completion is projected for the fourth quarter of 2028, with total costs estimated to range between \$315 million and \$448 million.

Under the BC WWS Capitol Improvement

V. Work Plan Projects

Since the 2023-2024 LECWSP Update, BCWWS has committed funds for PFAS Water Treatment and Transmission System Improvements. This includes construction of nanofiltration and associated improvements at Water Treatment Plants 1A and 2A for the treatment of perfluoroalkyl and polyfluoroalkyl substances (PFAS) to meet the Federal Environmental Protection Agency (EPA) maximum contaminant level (MCL) in drinking water. Also, the project includes a transmission pipeline between District

1 and District 2. BCWWS has committed \$28.2 million dollars with a future additional budget of \$449.4 for a total of \$477.6 million. The scheduled completion is anticipated by third quarter of 2031.

3. Advisory Comment 3:

Parkland was omitted from the description of the area served by BCWWS District 2 on Page 50 and page 59. A portion of Parkland is being served on the area served maps for BCWWS District 2 in the current Lower East Coast Water Supply Plan. Please revise accordingly.

Broward County Response:

Statement added referring to a portion of Parkland, which is part of the Coconut Creek Service area which is a bulk retail customer of WWS District 2A.

Page 50 modified to read:

- District 2 service area contains portions of the Cities of Deerfield Beach, Lighthouse Point, and Pompano Beach and provides water to portions of the City of Coconut Creek and Parkland as described below; and

Page 59 modified to read:

In District 2, raw water is treated at the District 2 WTP located in the City of Pompano Beach prior to distribution to BCWWS retail customers and the City of Coconut Creek, which also serves a portion of Parkland.

Graphic has been revised, as responded to comment 2, to clarify.

4. Advisory Comment 4:

Pompano Beach was omitted from the description of the area served by BCWWS District 1 on Page 56. A portion of Pompano Beach is being served on the area served map for BCWWS District 1 in the current Lower East Coast Water Supply Plan. Please revise accordingly.

Broward County Response:

Description refers to Utility interconnects not areas of Cities serviced. WS4 lists populations of all Cities served, including Pompano Beach.

5. Advisory Comment 5:

Please note, various links to the County's webpage used in Conservation section are inactive

Broward County Response:

Links to following pages were updated:

Water Management Element

[https://www.broward.org/BrowardNext/Documents/CompPlanDocsXD/WM%20GOPS Adopted January2022.pdf](https://www.broward.org/BrowardNext/Documents/CompPlanDocsXD/WM%20GOPS%20Adopted%20January2022.pdf)

Irrigation Restrictions

[Water Conservation Irrigation Restrictions](#)

Link to Code of Ordinances and link to Water Conservation-Based Rate Structure verified as working.