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COUNTY AUDUBON SOCIETY \* CLEAN WATER ACTION \* COLLIER  
COUNTY AUDUBON SOCIETY \* THE EVERGLADES FOUNDATION \*  
EVERGLADES LAW CENTER\* KISSIMMEE VALLEY AUDUBON SOCIETY \*  
LAKE REGION AUDUBON SOCIETY \* NATIONAL PARKS CONSERVATION  
ASSOCIATION \* SANIBEL-CAPTIVA AUDUBON \* SANIBEL-CAPTIVA  
CONSERVATION FOUNDATION\* SIERRA CLUB\* TROPICAL AUDUBON  
SOCIETY**

May 14, 2008

Chairman Eric Buermann  
Governing Board  
South Florida Water Management District  
3301 Gun Club Road  
West Palm Beach, FL 33406

Ms. Carol Wehle  
Executive Director  
South Florida Water Management District  
3301 Gun Club Road  
West Palm Beach, FL 33406

Dear Chairman Buermann and Ms. Wehle,

The undersigned environmental organizations write to you in support of the South Florida Water Management District's (District) efforts to amend 40E-24, F.A.C. Specifically, we write in reference to the third version of the Draft Year-Round Landscape Irrigation Rule 40E-24.201(5)(a) dated April 28, 2008.

Curtailing landscape irrigation permanently is widely recognized to be an effective method to realize the benefits of water conservation. The Joint Statement of Commitment for the Development and Implementation of a Statewide Comprehensive Water Conservation Program for Public Water Supply (2004)<sup>1</sup> provides that "conservation of water is an important means of achieving economical and efficient utilization of water and ensuring the sustainability of the water resources of Florida." South Florida's natural ecosystems have suffered due to the severe drought that has now persisted for two years. This drought has put additional strain on Florida's unique natural systems and the wildlife that depend on them. Water conservation is an appropriate and

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<sup>1</sup> [http://www.dep.state.fl.us/water/waterpolicy/docs/JSOC--new\\_small.pdf](http://www.dep.state.fl.us/water/waterpolicy/docs/JSOC--new_small.pdf)

necessary strategy to govern decisions regarding a scarce resource that should be protected for the public's benefit.

However, the Florida Department of Environmental Protection's Florida Water Conservation Initiative (2002) notes that "drought is not the only time when water should be used efficiently. Florida continues to grow rapidly and traditional sources of water are limited. Conservation will be an important way to meet new needs while protecting Florida's water-dependent natural environment." Therefore, implementing two day-a-week year-round landscape irrigation measures is necessary as a permanent strategy.

Reduced landscape irrigation is critical to ensuring the long-term availability of fresh water supplies for the natural and human environments. In addition to the environmental benefits, water conservation can lead to both economic and water supply benefits. Water conservation measures can reduce the rate of escalating costs by increasing the availability of water for water supply without having to create more infrastructure to meet demands. Similarly, any increased demand can be satisfied with the existing supplies, rather than having to create new supplies.

While this rule is an important first step towards creating a water conservation ethic District-wide, we believe that the landscape practices themselves must change in order to further conserve water for the environment. Therefore, we support the use of Florida-friendly landscapes and strive to, ultimately, make landscape irrigation unnecessary to maintain aesthetically-pleasing landscapes in south Florida's climate.

Water conservation must be a way of life in south Florida; it is no longer an option. It has become evident that moving in and out of water restrictions cannot be the answer to protecting such a valuable and finite resource. The two day-a-week landscape irrigation rule will reduce the amount of water removed from the environment, and will benefit the public and individual users.

We commend the District on its efforts to ensure that Florida's precious fresh water supply is not wasted through unnecessary landscape irrigation. The opportunity to have two day-a-week landscape irrigation is more than sufficient to maintain healthy landscapes in south Florida.

To ensure the sustainability of both the natural and human systems in south Florida, our individual demand on water supply must be reduced in order to provide a true balance to south Florida's various water needs. Thank you for your commitment to protecting the future of south Florida's regional water sources. The implementation of two day-a-week watering as defined in the third draft version of 40E-24.201(5)(a) is an important first step for the future of our regional water supply.

Sincerely,

**Signatures waived to expedite delivery**

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