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Providing clean, safe water for Polk County now and for future generations.

May 6, 2025

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Submitted through electronic mail to cregister@sjrwmd.com and floridaswater.formstack.com/forms/cfwi_planning

Subject: Draft 2025 Central Florida Water Initiative (CFWI) Regional Water Supply Plan (RWSP)
Polk Regional Water Cooperative (PRWC) Comments

Dear Ms. Register:

Thank you for the opportunity to review and provide feedback on the Draft 2025 CFWI RWSP. This letter outlines corrections to inaccurate information presented in Table E-2 and offers suggestions to enhance the clarity of project details.

PRWC Project Status Updates

The PRWC Southeast Water Production Facility and Transmission project is permitted to provide up to 30 MGD of finished water to communities in Polk County upon full buildout. Currently, Phase 1 is under construction and will deliver 7.5 MGD.

Similarly, the PRWC West Polk Water Production Facility is permitted to supply up to 10 MGD at full buildout. Phase 1 is currently in the design stage and will provide 2.5 MGD.

To more accurately reflect the status of these projects, we recommend the following revisions to the main document:

- **Page 14:** The description of PRWC Projects should read: "As noted above...the Southeast Polk Wellfield is now being constructed to deliver 7.5 MGD of Phase 1 finished water supply, with a buildout capacity of up to 30 MGD. The West Polk Wellfield Project is being designed to provide 2.5 MGD in Phase 1 and is anticipated to develop up to 10 MGD at full buildout."
- **Page 75** (first paragraph): The revised wording should state: "The PRWC's Southeast Polk Wellfield project was permitted by the SFWMD to provide 30 MGD at full buildout. It is anticipated to deliver 7.5 MGD of new water supply in Phase 1 for PRWC members."

Clarification of Project Cost Representation in Table E-2

Public water suppliers utilize RWSP documents as a tool for long-term infrastructure planning and cost comparisons. To ensure clarity and prevent misinterpretation of affordability differences among projects, we recommend adjustments to the presentation of costs in Table E-2.

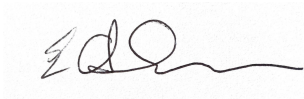
Certain projects—2015_28, 2015_141, and 2020_5—appear inconsistent with other brackish water projects. For example:

Project 2015_3_4_5 (Cypress Lake) appears to list its permitted withdrawal as “Project Capacity” and its finished, buildout capacity “Generated or Water Resource Benefit.” Project 2020_1 (OUC Wellfield) presents both values as 10 MGD, even though it is permitted to withdraw 11.8 MGD for a finished water supply of 10 MGD.

The PRWC projects do not clearly distinguish between permitted and phased capacities but are instead structured around the cofunding agreement. To improve clarity, we propose the following adjustments:

- Project 2015_28 (Polk Southeast Wellfield Water Production Facility): “Project Capacity” should reflect 37.5 MGD (permitted withdrawal) to align with how the Cypress Lake project is presented. The 12.5 MGD “Generated or Water Resource Benefit” can remain as shown in the SWFWMD Cofunding Agreement Project Plan, but should correlate to a value of **\$247.5M**, not \$481M. The presented unit costs do not reflect currently projected values; to date, unit costs have only been computed based on the Phase 1 capacity of 7.5 MGD.
- Project 2020_1 (West Polk Wellfield): “Project Capacity” should reflect 13.3 MGD (finished, permitted withdrawal). “Generated or Water Resource Benefit” should indicate 10 MGD, aligning with the \$214M capital cost detailed in the Cofunding Agreement.

Thanks again for the opportunity to provide comments. If there are questions or clarifications, please don’t hesitate to reach out to me.



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