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**Subject:** City of Hallandale Beach Proposed Comprehensive Plan Amendment #20-1ESR  
**Date:** Friday, November 20, 2020 4:49:01 PM  
**Attachments:** [Work Plan Tech Assist Guide-July 2020.pdf](#)

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Dear Ms. Leroy:

The South Florida Water Management District (District) has completed its review of the proposed amendment package submitted by the City of Hallandale Beach (City). The amendment package includes the City's 10-Year Water Supply Facilities Work Plan Update (Work Plan). The District offers the following comments and recommendations for revising the proposed amendment package and requests that the City address these comments and recommendations prior to adopting the amendment:

### **Section 2.1 Servicer Area and Section 3.2 Current and Future Served Areas**

- Revise the Sections to include a map or a narrative of the areas served by domestic self-supply systems. Regional water service to be provided to these areas in the future, if any, should be described. If no domestic self-supply systems exist, clearly state that none exist or are known to exist.

### **Section 2.2.4 Infrastructure Development and Section 3.5 Population and Potable Water Demand Projections**

- Revise information in the Regional Water Availability (RWA) Rule portion of the Sections to include the following:
  - The RWA Rule limits public water supply utilities to the maximum quantity withdrawn during any consecutive 12 month period during the five years preceding April 2006. Utilities needing additional water supplies are required to seek water sources that will not induce additional seepage from the Everglades or connected sources.
  - The recently issued District Water Use Permit (WUP) increased the City's Biscayne Aquifer withdrawal back up to 4.03 mgd when Well 9 is in production. This well is currently still proposed, and the authorized limit is 3.5 MGD.
- Revise information in the C-51 Reservoir Project portion of the Sections to reflect the following:
  - The captured stormwater would be used to recharge the Biscayne Aquifer. Treatment of this water for potable use will remain the responsibility of local water utilities.
  - Update the estimated date of when the C-51 Reservoir Project will become operational. Revise Tables 6 and 7 to reflect the operational date.

### **Section 2.2.5 Lake Okeechobee Surface Water Allocations Limitations and Section 3.5 Population and Potable Water Demand Projections**

- The RWA base condition for water allocation from the Biscayne Aquifer for Hallandale Beach is 1,473 MGY (4.03 mgd). The last sentence on page 19 of 39 gives an incorrect amount of 8.29 mgd. Clarify the Section by explaining that 4.03 mgd is Hallandale Beach's base condition and the rest is the base condition of Broward County, from whom the City purchases bulk water.

### **Section 3.3 Potable Water Level of Service Standard, 3.4 Historic Raw and Finished Water Production, and 5.0 Goal, Objectives and Policies**

- Revise the Sections and Table 2 to include relevant and appropriate supporting data and analysis to explain how the Level of Service (LOS) Standard of 178 gpcd was determined, as required by Section 163.3177(1)(f), Florida Statutes. Information in Sections 3 and 5 and Tables 3 and 5 indicate that the current and projected LOS Standard for the City is 148 gpcd.
- Revise Infrastructure Element Policy 1.1.1, Conservation Element Objective 1.1, and Capital Improvements Element Policy 1.2.5 to include a LOS Standard for potable water supported by and consistent with the revised relevant and appropriate supporting data and analysis in Sections 3.3 and 3.4 and Tables 3 and 5.

### **Section 3.6.2 Hallandale Beach Wellfield**

- Clarify the Section to reflect that the City's current WUP does not limit annual withdrawals based on MGD. The annual allocation expressed in GPD or MGD is for informational purposes only.

### **Section 3.8 Conservation**

- Revise the Section or add an additional Sub-Section, to include a description of how the City has been implementing the District's Mandatory Year-Round Landscape Irrigation Conservation Measures (YRR), as detailed in Chapter 40E-24, Florida Administrative Code (F.A.C.). To encourage more responsible use of water resources throughout South Florida, the District's Governing Board adopted the Year-Round Irrigation Rule in 2010. The Rule restricts the times and number of days landscape irrigation is allowed within the District's jurisdiction and follows scientifically-sound recommendations for lawn irrigation. The District is requesting local governments to review their existing irrigation ordinances and codes for consistency with the District's Year-Round Landscape Irrigation Conservation Measures Rule, Chapter 40E-24, F.A.C., and update their ordinances as appropriate. Please include a timetable in the Section.

### **Section 3.8.5 Permanent Irrigation Ordinance**

- Expand the Section to clarify if City Ordinance, Chapter 30 – Utilities, Article III, Division 4 –Conservation (Sec. 30-131 to Sec. 30135) provides for enforcement of the SFWMD's Chapter 40E-21, F.A.C for water shortage conditions and Chapter 40E-24, F.A.C, which restricts the watering of landscaping to two days a week.

**General Comments**

- Revise all maps, figures, charts and tables to include a title, date or edition, and source of information.
- Revise the Work Plan to be in a strike through and underline format, as required by Section 163.3184(3)(c)3., F.S.
- Revise all documents that are being incorporated in the City's Comprehensive Plan by reference to identify the document by the title and author(s) of the document and indicate clearly what provisions and date or edition of the documents are being adopted, consistent with the requirements of Section 163.3177(1)(b), F.S.

The District requests that the City forward a copy of the adopted amendments to the District. Please contact me if you have any questions or need additional information.

Sincerely,

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