

MIAMI BEACH

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PLANNING DEPARTMENT
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April 30, 2018

Terry Manning, AICP, Policy and Planning Analyst
South Florida Water Management District
Water Supply Coordination Unit
3301 Gun Club Road, MSC 4223
West Palm Beach, FL33406

Re: Response to Comments from the South Florida Water Management
District for the Proposed Comprehensive Plan Amendment, Miami Beach
#18-1ESR

Dear Ms. Manning,

The City of Miami Beach is in receipt of the South Florida Water Management District's comments regarding the City of Miami Beach's proposed Comprehensive Plan amendment to increase the FAR in the North Beach Town Center (DEO No. 18-1ESR). The following provides details on existing and proposed legislation and agreements that address the District's concerns.

Comment 1:

The amendment should be revised to include an analysis that demonstrates that the City will have the ability to provide the water for the increased water demand.

In response to the first comment, City staff conducted an analysis of the water supply planning measures currently in place. The City has a 20-year wholesale water service contract with Miami Dade County. The agreement does not place caps on the City's ability to purchase water (See attached agreement).

Also attached is the Miami-Dade County Water Supply Facilities Work Plan Update. It presents the Miami-Dade Water and Sewer Department's (MDWASD) water supply systems and provides a plan for implementing water supply facilities, including the development of traditional and alternative water supplies necessary to serve existing and new development.

The Bureau of Business and Economic Research (BEBR) estimates the City of Miami Beach population to be 92,779. The potential for 2,162 new units, as denoted in the Concurrency Analysis, could increase the City of Miami Beach population by up to 2,412 residents. This would increase the City's population to 95,772.

This population is within MDWASD's population projections for the City of Miami Beach for 2015/2016, 2020 and 2025 and the BEBR projections for 2025 (See Table Below).

Population Projection		
Year	BEBR	MDWASD
2010	87,779	93,053
2015/2016	92,799	96,196
2020	95,537	99,334
2025	98,342	102,474

MDWASD has projected that there is sufficient water supply to meet the needs of this population growth. However, this population growth scenario is unlikely as a result of this Future Land Use Plan Amendment. The projected growth utilizes a worst case scenario where multifamily unit sizes are at the smallest size permitted with minimal room for circulation space. If such units were to develop, they tend to consume much less water than a typical residential unit, and would have lower population counts significantly reducing the population potential. Additionally, the currently adopted City of Miami Beach's adopted 10-Year Water Supply Facilities Work Plan indicates that there is a downward trend in per capita water usage.

Finally, as future developments are processed through the building department MDWASD approval is required prior to the issuance of any permit for new development. This is a current procedure during the building permit process as required per the 2025 Comprehensive Plan Intergovernmental Coordination Element (See Policy 1.8 below). This ensures that all new development will have their water supply accounted for before the issuance of a building permit.

Policy 1.8

The City will coordinate with Miami-Dade County WASD in the review of site plans prior to the issuance of a building permit to determine whether adequate water supplies will be available to serve new development no later than the date of the certificate of occupancy.

This will ensure that all new development will have their water supply accounted for before the issuance of a building permit. Water conservation measures are also in place within the comprehensive alleviating the future burden of development on the existing infrastructure.

Comment 2:

Revise the proposed amendment to demonstrate how water conservation measures will be utilized to support the anticipated redevelopment of the Overlay Area. Include how conservation measures could be utilized for non-potable water uses, including water for landscape irrigation.

In response to the second comment, it is expected that the proposed amendment will create more energy efficient buildings that do not currently exist in the area. Existing buildings will

have to meet newer plumbing codes and renovations will have to include updated plumbing fixtures and appliances. A Public Benefits Program will be included in the implementing Land Development Regulations (LDRs). The LDRs currently require the development of LEED Gold Buildings, which contain many requirements for water efficient buildings. The proposed companion LDRs ordinance will provide significant incentives for the development of LEED Platinum buildings which provide for even greater water efficiency. The LEED prerequisites call for 20% reductions in indoor and outdoor water use. Additional LEED credits may be obtained for up to 50% reductions in indoor water use or 100% reduction in outdoor water use. It is the City's intent to create new building stock with water conservation in mind through programs such as these. The implementing LDR ordinance will also provide incentives to provide for greater storm water retention and for the reuse of that storm water with the use of "Purple Pipe."

Many water conservation strategies are currently found within the 2025 Comprehensive Plan including the following from the Infrastructure Element which are implemented through the LDRs and other Public Works documents:

Policy 6.1

All potable water distribution systems shall maintain the unaccounted for water loss to less than 10 percent of the water entering the system.

Policy 6.2

Continue to promote the education program for residential, commercial and industrial consumers which will discourage waste and conserve potable water.

Policy 6.3

The Parks Department shall continue to install underground irrigation systems thereby, conserving potable water while watering public spaces.

Policy 6.4

Consistent with the policies of Miami-Dade County, water shall be delivered for general use at a pressure not to exceed 100 psi.

Policy 6.5

Within one year of the effective date of this policy, the City shall review existing water conservation regulations and revise the land development code as necessary and effective to ensure implementation of water conserving techniques, including: 1) subsurface and other water conserving irrigation techniques, 2) xeriscaping techniques, 3) lawn watering restrictions, 4) the use of low water use plumbing fixtures in all construction, and 5) any other effective methods commonly in practice or required by law. In addition, the City Manager shall immediately, upon the effective date of this policy, direct appropriate City departments to implement all such techniques as may be implemented by the City in its normal operations and require private property owners to implement all

such techniques.

Policy 6.6

The City, through the Building Department, will continue to enforce the requirement to use high efficiency volume water saving devices for substantial rehabilitation and new construction projects as specified in the standard plumbing code. All future development within the City will be required to comply with water use efficiency techniques for indoor water use in accordance with Section 8-31, , 32-83.1, 32-84 and 8A-381 of the Code of Miami-Dade County. In addition, all future development will be required to comply with the landscape standards in Section 18-A and 18-B of the Miami-Dade County Code.

Policy 7.5

If in the future there are issues associated with water supply, conservation or reuse the City will immediately contact WASD to address the corresponding issue(s). In addition, the City will follow adopted communication protocols with WASD to communicate and/or prepare an appropriate action plan to address any relevant issue associated with water supply, conservation or reuse.

Conservation – Water Supply Facilities Work Plan Policy 13.2

The City will require the use of High Efficiency Toilets; High Efficiency Showerheads; High Efficiency Faucets; High Efficiency Clothes Washers; and Dishwashers that are Energy Star rated and Water Sense certified in all new and redeveloped residential projects.

Policy 13.4:

The City will educate the development community on the water saving benefits of the use of Florida Friendly Landscapes guidelines and principles; gutter downspouts, roof runoff, and rain harvesting through the use of rain barrels and directing runoff to landscaped areas; drip irrigation or micro-sprinklers; and the use of porous surface materials (bricks, gravel, turf block, mulch, pervious concrete, etc) on walkways, driveways and patios.

Policy 13.6:

The City will continue to enforce the landscape watering restrictions mandated by the South Florida Water Management District. The City will continue to use code enforcement measures such as issuing warning and fines to enforce the water restrictions.

Other water conservations strategies implemented through the LDRs the promotion of blue roofs which would capture all rain run-off and make it available for onsite re-use. Thus reducing the amount of water required for the daily operations of the buildings. The City has allowed for height exceptions and removed permitting fees in order to encourage such roofs.

The City currently participates in and promotes all SFWMD and Miami Dade County Water Conservation programs and rebates, such as free showerhead exchange, Multifamily Showerhead retrofit program, and high efficiency fixture rebates. Additional community outreach is provided to train them on and provide rain barrels.

Comment 3:

The City is required to revise its Water Supply Facilities Work Plan (Work Plan) within 18 months after approval of the Lower East Coast (LEC) Water Supply Plan Update by the District's Governing Board. The District's Governing Board approved the LEC Water Supply Plan Update on September 12, 2013. Therefore, the City's Work Plan was to be adopted by March 12, 2015; however, the District has not received the updated Work Plan for review to date. The City will need to include updated water demand projections for the identified planning period, identify alternative and traditional water supply projects, and conservation and reuse activities needed to meet the projected future demands. Planning tools are available on the District's website for your use and District Staff are available to provide technical assistance to update the Work Plan, including reviewing draft Work Plans prior to formal plan amendment submittal. The planning tools are located at this link: <https://www.sfwmd.gov/our-work/water-supply/work-plans>.

In response to the third comment, the City is currently working on an update to the City's Water Supply Facilities Work Plan. It is expected to be completed as a part of the 2018 Evaluation and Appraisals Report amendments, which are due within the next year. The City will update water demand projections for the identified planning period, identify alternative and traditional water supply projects, and provide additional conservation and reuse activities which will allow the City to reduce water consumption below the projected future demands.

Sincerely,



Thomas Mooney, AICP, Director
City of Miami Beach Planning Department

CC: Ray Eubanks, Plan Processing Coordinator,
Florida Department of Economic Opportunity

TRM/RAM/FAA