

**PUBLIC INTEREST:**

- The applicant is a public supply utility that supplies potable water within its service area.
- The proposed use qualifies as a reasonable-beneficial use and the applicant has water resource impact offset timelines, commitments, processes, and follow up plans in place.
- The proposed use is consistent with the public interest pursuant to section 3.10, A.H., provided permit conditions are met.

**INTERDISTRICT TRANSFER OF WATER:**

- A portion of the groundwater withdrawn in the SJRWMD is used within the SRWMD, but within the same county (Alachua County), therefore the transport from SJRWMD into SRWMD is not an "interdistrict transfer and use" as that term is defined in subsection 373.2295(1), F.S. However, that subsection provides that such a transport and use of groundwater from one District to another within the same county is still subject to subsections 373.2295(4), (11) and (13). Subsection 373.2295(4) specifies that in determining whether the application is consistent with the public interest, projected populations contained in the future land use elements of comprehensive plans adopted by local governments within the area of withdrawal and use, together with other evidence of future use, be considered. Subsection (4) further states that if the proposed transfer and use meet the requirements of Chapter 373 F.S., and if the needs of the area of use and the area of withdrawal can be satisfied, the permission to transfer and use the water shall be granted. In evaluating the application pursuant to subsection 373.2295(4), staff reviewed the population projections of local governments in the area of withdrawal and use, recognizing that all would seek to obtain additional groundwater. GRU will serve all of those populations except those on domestic self supply wells.
- Subsection 373.2295(11), F.S., addresses local land use designations that may need to be changed to allow a proposed use and does so by empowering an applicant for a local land use change to appeal an adverse decision of a local government to the Land and Water Adjudicatory Commission, which can grant exceptions to a local comprehensive plan or ordinance. Subsection 373.2295(13) authorizes the Land and Water Adjudicatory Commission to overturn adverse decisions for local government development permits associated with transport and use. Neither subsection is applicable at this point in time and no adverse local land use decisions have occurred. A copy of the subject application and any and all subsequent submittals has been submitted to the SRWMD staff for review and comment. Comments concerning the application were received from the SRWMD staff and have been addressed in the review of this permit.
- A notice of preliminary intended agency action has been provided to SRWMD, the applicant, and Alachua County.