

January 21, 2022

To Mayor Jane Castor:

City staff have requested our coalition's support for your request for initial funding related to the PURE project, which will be brought before City Council on February 3, 2022. We commend City staff for their patience and diligence in meeting with stakeholders, especially our coalition, which includes Friends of the River, the Sierra Club and the League of Women Voters. We also appreciate their effort to make this a thoughtful and well-considered process.

Our coalition continues to have concerns relating to addressing Tampa's water challenges through the addition of treated wastewater to the aquifer and river. However, we support the city's interest in evaluating and comparing multiple alternative combinations, source control, prototyping ion exchange, suspended ion exchange, and, in particular, the planned public outreach, which we hope will result in substantive dialogue, community education and opportunities for public input. We expect to continue to contribute to that exchange and are therefore not opposed to the proposal you are sending to the City Council on February 3.

Throughout this process, our three groups have raised many questions and concerns about the proposed project with City staff. Our concerns are detailed in the attachment to this letter. We would like to stress that further serious consideration of more aggressive conservation, expansion of PIPES, buying more water from Tampa Bay Water, and deep well injection for non-potable purposes would all be predictive and responsive to current public concerns.

It is important for the City to obtain public understanding and support for the final approved version of the PURE project (as it may be designed in this process). We strongly suggest decisions made on the Project be subject to several subsequent incremental approvals at various steps along the way, and only after there has been clarification of:

- (1) the water quality targets that will be established for the treated wastewater before it is either injected into the aquifer, or the river, or provided for direct potable supply;
- (2) justification of the need for the alternatives selected by the City for the PURE project;
- (3) prototyping the water treatment processing to obtain acceptable measurable results that will be accepted by the public; and
- (4) determining what the true cost of the PURE project will be and what the impact will be upon utility rates for Tampa residents.

At each juncture, City Staff should be required to come back to City Council to seek approval for the next step with supporting data to justify the need and the approach for which additional funding is needed.

The state legislation has a 10-year compliance window and there is no need to rush this PURE project.

With these conditions imposed by the City Council, we support both funding requests for this initial phase of the project.

Sincerely,
Friends of the River
Sierra Club Tampa Bay Group
League of Women Voters of Hillsborough County

Cc. Tampa City Council, Brad Baird, Chuck Weber

ATTACHMENT

PURE Recommendations

Water is a precious resource and Tampa needs it for drinking, gardening, recreation, and keeping the Hillsborough River and its ecosystem healthy and flowing. PURE attempts to “drought-proof” the City for generations to come. But it seems clear that the City cannot deliver a safe treated wastewater product at an affordable cost without unknown risks for the health of future generations. We must not sacrifice public health and safety, or the health of Tampa Bay’s nursery in the Hillsborough River, just to ensure we can continue to use much of our water to keep lawns green. To do so would represent a massively inequitable solution to this challenge. It may be technically feasible to create safe treated wastewater, but at what cost to residents? We must not cut corners on a treatment process necessary to deliver safe water in order to achieve a lower cost. While we do support the staff’s funding proposals now before Council, please note that, going forward, the public should be informed of all the facts, along with a full exploration of all alternatives to meet this new state mandate.

Using treated wastewater for drinking water should be the last answer, not the first! Wastewater that has been treated to reclaimed water for lawn watering has enough contaminants that [Tampa’s webpage](#) says not to drink it or use it in your pool. The City’s current plans appear poised to put processed reclaimed water into the aquifer, into the Lower Hillsborough River and into the drinking water supply.

The City has not explained to the public other alternatives for wastewater re-use to satisfy the new state statute and to provide minimum flows for the Hillsborough River and compared them to non-wastewater alternatives such as conservation and buying more water from Tampa Bay Water.

Tampa City Council will be voting on initial funding for the PURE Project. The design options should prioritize solutions that do not require Tampa citizens to drink recycled wastewater. There are ways to assure Tampa’s water supply without requiring it for drinking water, and these need to be explored fully. We recommend:

Slow down. We have at least 10 years under current State legislation requiring Tampa to eliminate nonbeneficial wastewater discharge - and more time if the statute is amended.

Explain why more water is needed to supplement Tampa’s current supply: Tampa gets drinking water from the Hillsborough River, Tampa Bypass Canal, and via Aquifer Storage and Retrieval. It also uses water from Sulphur Springs for minimum flows to support the health of the River’s tidal estuary. There are savings from the project PIPES. 20% of our “drinking water” supply is used to keep lawns green. Is the purpose of PURE to, in effect, “drought proof” our drinking water supply so we can continue to use water in this manner? Why can we not just conserve water? How much would we have to conserve? Why not use more water from the Tampa Bypass Canal - which comes from Tampa Bay Water - to meet minimum flows?

Place greater emphasis on ways to reduce and reuse wastewater: Other alternatives to ensure adequate supply include promoting conservation education, reducing water use, and expanding the purple pipe system which uses reclaimed water for lawn irrigation.

Prioritize Non-drinking water uses for treated wastewater: We recommend serious consideration of [Combination 2*](#) that uses the treated wastewater for the Hillsborough River minimum flow and would sell the rest and also comparison to deep well injection.

Pursue a regional water solution: Tampa Bay Water has been able to provide sufficient water even during drought periods. If more water is needed in the future, the cost to process wastewater to drinking water should be shared by the whole region – Tampa citizens should not pay the entire bill for an expensive approach. Water from a variety of currently available sources could be used for minimum flows.

Demonstrate that the treated wastewater is safe. Florida’s current drinking water standards do not cover all contaminants found in wastewater. At a minimum, the water quality should **not increase the level or number**

of contaminants above those currently found in the Hillsborough River Reservoir, whether it is used for drinking or minimum flows.

Document and control what contaminants are in the wastewater: There are over 60 industries dumping wastewater into the supply that Tampa proposes be reused. A proposed Florida rule could require that these sources be documented, monitored, and controlled. What happens if an industry dumps unauthorized contaminants into the wastewater? Will our children be drinking that?

Build a prototype to demonstrate the safety and efficacy of the recommended solution. Tampa citizens need to be confident that their drinking water is safe. Relying upon reclaimed water and new, unproven technology will be concerning to water users without confirming the safety and efficacy of PURE.

Know for certain that putting 50 mgd of water in the aquifer under central Tampa will not cause flooding, sinkholes, well contamination or other irreparable damage. Model and test extensively what this quantity of water would do to the aquifer and river before even considering starting a design.

Provide detailed cost estimates. Compare [COMBINATION II*](#) and [COMBINATION III*](#) to the cost of expanding purchases from Tampa Bay Water, and other alternatives. If the reclaimed water is to be used for drinking, the cost of Reverse Osmosis (RO), the currently used technology, would offer the best high end cost estimate. How much will this increase utility rates?

Request an exception to SB 64 to provide exemptions from this new state law. This new law is an unfunded mandate by the Legislature that may well cause great harm. Tell them that we should not spend money for wastewater processing that is of no benefit to us.

*For more Information: Tampa PURE webpage. <https://www.tampa.gov/water/projects/pure>

Tampa PURE Issues and Concerns <https://www.sierraclub.org/florida/tampa-bay/conservation-growth-management>