

WEST VILLAGES IMPROVEMENT DISTRICT
C/O Special District Services, Inc.
19503 S. West Villages Parkway #A3
Venice, Florida 34293

March 24, 2025

Via U.S. Postal Service

RE: Water Use Permit Modifications

Dear Gran Paradiso Resident,

West Villages Improvement District (WVID or District) is writing to inform you that irrigation water services to Gran Paradiso will be terminated at the close of business on **March 31st, 2025**.

On Dec. 12, 2024, the WVID Board of Supervisors adopted a resolution (Resolution 2024-28) consenting to a request to modify the existing Water Use Permit, issued by the Southwest Florida Water Management District (SWFWMD), to redistribute irrigation water resources within Gran Paradiso to the remaining lands throughout the District's service area. The decision to authorize the requested modifications came after careful consideration and was in the best interest of the landowners and residents of the entire District.

The Gran Paradiso Property Owners' Association (GPPOA) was notified on Dec. 20, 2024, of the water use permit modifications. At that time, the WVID informed the GPPOA that it would need to find alternative water resources in the community.

The Water Use Permit modification was approved by the SWFWMD effective Feb. 10, 2025. Pursuant to the direction provided in the resolution, WVID staff is working expeditiously to modify the irrigation infrastructure within, and serving Gran Paradiso, to isolate the community's irrigation quality water system from the WVID system. Those modifications are underway and are expected to be substantially completed at the close of business **on March 31, 2025**, at which time Gran Paradiso residents will need to find alternative irrigation resources.

The WVID has prepared this letter to better inform Gran Paradiso residents about the irrigation water system, the Water Use Permit modifications, and provide notice that WVID will no longer be providing irrigation water to GPPOA as of the close of business, **March 31, 2025**.

What is a Water Use Permit?

In 2018, the Southwest Florida Water Management District (SWFWMD) issued a joint Water Use Permit to the WVID and The Ranch Land Operations. The Water Use Permit- which allows the permittees to conjunctively use surface water, reclaimed water, and groundwater for landscape/recreation irrigation- was issued for 50 years and regulates the District's use of irrigation water on all lands within the district, except for IslandWalk, which was separately permitted. WVID's inclusion on the Water Use Permit requires the consent and cooperation of The Ranch Land Operations and Thomas Ranch Intangibles (Ranch Entities).

This permit determines how much groundwater is available to help meet the irrigation demands for the property included within the permit. Permitted quantities are based on the number of irrigable acres within a specific boundary, as well as other factors such as the use type, and irrigation system used.

The permit's overall annual average daily groundwater allocation is approximately 2.4 million gallons per day. In a peak month, the allocations shift to approximately 6.7 million gallons per day. Under the modified Water Use Permit, total irrigation demands are approximately 3.0 million gallons on an annual average daily basis and 9.3 million gallons per day in a peak month. Those quantities are allocated under the Water Use Permit to specific, defined areas. If the WVID uses more irrigation water supplies than allocated, the District risks losing its Water Use Permit. If this were to occur, WVID would not be able to provide irrigation water service to its customers.

Why did the WVID Board of Supervisors consent to the Water Use Permit modification?

On Dec. 3, 2024, the District received a letter from the Ranch Entities demanding the District approve the permit modifications. The demand followed approximately two years of litigation surrounding irrigation quality water involving the District and the GPPOA.

The Ranch Entities asserted that the WVID has not maintained compliance with various terms of the Water Use Permit, including Gran Paradiso's repeated and consistent exceedance of its irrigation allocations, and is in breach of a 2018 Water Supply Agreement between WVID and the Ranch Entities. This occurrence jeopardizes WVID's ability to remain on the Water Use Permit and its ability to provide irrigation quality water to its customers.

Recognizing the importance of the Water Use Permit to the overall system, the Board of Supervisors acted within the best interest of the landowners and residents of the entire district.

How does this impact Gran Paradiso residents?

The GPPOA was notified on Dec. 20, 2024, of the water use permit modifications. At that time, the WVID informed the GPPOA that it would need to find alternative irrigation water resources to serve the community. The modification will not affect the District's ability to maintain district property within Gran Paradiso.

Does this impact the ongoing irrigation litigation with the GPPOA?

Since the irrigation litigation was initiated in December 2022 the GPPOA has consistently argued that the existing irrigation quality water supply agreement between WVID and the GPPOA should be voided and of no further force and effect. If the court were to agree with GPPOA, this would result in WVID ceasing to provide irrigation quality water service to the residents in Gran Paradiso. As a result, the permit modification also works to achieve the objective of the GPPOA in the irrigation litigation.

How does this impact other WVID communities?

The modification will have no impact on, and was necessary to ensure the continued access and availability of irrigation quality water to, other communities and properties throughout the District.

Additionally, the Ranch Entities agreed to cover all costs associated with the Water Use Permit modifications, as well as any changes or improvements to the irrigation system necessary as a result of the Water Use Permit modification. As a result, WVID's landowners and residents are not funding any costs associated with this work.

When does the change go into effect?

The Ranch Entities submitted the application for permit modification to the SWFWMD on Dec. 13, 2024. No challenge to the Southwest Florida Water Management District's proposed issuance of the WUP modification was timely received, and so that modification became final and effective February 10, 2025.

Pursuant to the direction provided in the District's resolution, WVID staff has been working expeditiously to modify the irrigation infrastructure within, and serving Gran Paradiso, to isolate the community's

irrigation quality water system from the WVID system to ensure compliance with the current Water Use Permit. Those modifications are expected to be substantially completed at the close of business **on March 31, 2025**, at which time the existing irrigation quality water supply agreement between WVID and the GPPOA will terminate and Gran Paradiso residents will need to find alternative irrigation resources.

How is the District addressing other concerns raised by the Ranch Entities regarding permit compliance?

WVID recognizes the importance of permit compliance and is committed to taking the steps necessary to ensure WVID's operations comply with the permit's requirements.

The District will continue to work to ensure customers are not exceeding water allocations in violation of permit requirements, implement conservation requirements, and ensure compliance with the Water Use Permit.

Why is water conservation important?

Water conservation is a key element of the Water Use Permit. In accordance with that element, WVID is required to implement SWFWMD-approved water conservation plans. This plan requires the District to supply irrigation quality water quantities to its customers based on the SWFWMD's AGMOD model and ensure compliance with permitted quantities. It also calls on customers, such as homeowners associations, to create and implement their own water conservation plans which the District oversees.

As the agency responsible for the implementation of and compliance of the SWFWMD water use permit, the WVID is committed to acting within the best interest of the landowners and residents to ensure the entire district has access to reliable and affordable irrigation quality water. For additional information about irrigation resources, visit westvillagesid.org.

Please contact District Manager William Crosley at 941-244-2805 or wcrosley@sdsinc.org with any questions.

Thank you,
West Villages Improvement District