

Friendly Amendment to Cistern Demotion in BPAS

Opposition to Removing Cisterns from BPAS Prerequisites

It has come to the attention of the Sustainability Advisory Board that the City Commission will be revisiting the cistern prerequisite in the Building Permit Allocation System.

We are under the understanding that the solution requested was for an escape clause, NOT a wholesale demotion from mandatory to optional points. The City Commission voted to keep cisterns as mandatory during the two readings of the ordinance on April 3rd and June 5th.

The Sustainability Board is still in unanimous opposition to removing the mandatory cistern line item from BPAS. Not only have the [reported original reasons](#) for supporting cisterns not changed since our original presentation to the City Commission the last time this item was heard, the situation has become worse.

Findings Since Last Debate

- FKAA says [Turkey Point situation has gotten worse](#).
- FKAA says water use spiking.
- The infamous expensive cistern at Poinciana Housing was costly due to design decision flaws.
- Marathon affordable housing More, New Affordable with Cisterns
- Current pricing on plastic vertical water tanks in Florida ranges from \$0.40 to \$0.62 per gallon.
- Two of the five largest roofed buildings chose to pay \$5,000 to the Tree Fund for 10 extra BPAS points.

Friendly Amendment:

This doesn't mean that the SAB doesn't understand that keeping this item an absolute mandate can be problematic in some cases, namely:

- Existing, built out properties.
- Very large roofed, multi-unit properties that prioritize affordable housing.

We offer the following "escape clause":

- If the property is truly built out and incredibly impermeable, some mitigative work will definitely be needed to offset their footprint elsewhere. In the case of build out, the applicant can pay into the City's Stormwater Fund at \$1/gallon of what their roof dictates.
- In the case of high density, multi-unit, heavily affordable properties with roofs larger than 25,000 square feet, the applicant may ask for a variance for an alternative sized cistern, no less than half the required gallons, and make the case for why the prerequisite size does not work for them.

The Sustainability Advisory Board is open to other ideas along these lines, as long as they do not take cisterns off the mandatory list. We encourage an actual discussion of solutions, rather than another wholesale change.

We also wish to make an example of the mandatory cisterns at the City's new affordable units on Stock Island. We request that every effort be made to showcase an incredibly affordable, quality cistern to help other developers that feel they cannot achieve this.

We also request that the City look into allowing cisterns to meet the stormwater requirements of retaining rainfall on property. Many other City's have done this, and it would not only further incentivize cisterns on already built properties, but also relieve land space currently dedicated to swales, which take up far more room than a cistern, and limit the overall buildability of the lot. This will greatly affect the affordability of building.

Sincerely,

Monica Haskell
Chair, Sustainability Advisory Board