

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
1	Pat Welch, Save Our Lakes Organization, Inc (SOLO)	11/16/2021 Technical Methods SJRWMD Workshop Verbal Comment	<p>Mr. Welch asked the following questions:</p> <ol style="list-style-type: none"> 1. Will the projects from the 2017 NFRWSP be considered for the current Plan? 2. Will there be a presentation of the drawdown in the Upper Floridan aquifer? 	<p>11/16/21 Verbal response:</p> <ol style="list-style-type: none"> 1. This workshop is for the technical methods for projections. The need for projects will be determined later in the planning process. 2. We have not completed the modeling work yet. That information will be presented at a later workshop.
2	Vivian Katz-James, Save Our Lakes Organization, Inc (SOLO)	11/16/2021 Technical Methods SJRWMD Workshop Verbal Comment	<p>Ms. Katz-James asked the following question:</p> <p>SOLO submitted several projects last time. Do we need to resubmit projects, or will you review them for validity for inclusion in the new plan?</p>	<p>11/16/21 Verbal response:</p> <p>After we perform the impact assessment, there will be outreach and a new project solicitation process with stakeholders in the region.</p>
3	North Florida Utility Coordination Group (NFUCG)	11/18/2021 thru 1/13/2022 via multiple emails, phone calls, and meetings	<p>During the development of technical methods for population projections of the 2023 NFRWSP, feedback was provided regarding projections for utilities in the North Florida Utility Coordination Group (NFUCG).</p>	<p>Stakeholder feedback resulted in adjustments to population projections for the utilities as detailed in the May 23, 2022, Technical Memorandum “Documentation and Methodologies for Updating St. Johns River Water Management District 2020-2045 North Florida Regional Water Supply Plan Projections Resulting from Stakeholder Feedback”. This Technical Memorandum has been added to Appendix B.</p>
4	Stacie Greco, Alachua Environmental Protection Department	6/14/2022 via email	<p>Good afternoon.</p> <ol style="list-style-type: none"> 1. I have viewed the website and the spreadsheets. I find the information difficult to follow in the current format. Are there plans to do presentations or reports to provide some narrative to accompany 	<p>6/16/22 Email Response Sent (Note: To facilitate review, the responses below are numbered to correspond with the questions in the email.)</p> <p>Thank you for your questions and comments.</p>

Appendix A

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			<p>the information? If so, will there still be opportunities for stakeholder input at that point?</p> <p>2. My initial questions are about the conservation scenarios. It seems that the First Conservation Scenario is based on 2020 CFWI estimates. Could you please provide additional information as to what that means? The Second Conservation Scenario - Public supply is based on "savings achieved if each Part 2014-2018 average gross per capita rate was met by respective utilities". Could you please expand upon what that means. The projected water conservation varies greatly between these two scenarios and I am trying to understand what is driving that difference.</p>	<p>1. We apologize for the difficulties you are having navigating the North Florida Regional Water Supply Partnership webpage and associated data.</p> <p>Two Technical Methods workshops were held in November 2021, at which the methods for developing the population and water demand projections were presented. Comments regarding the methodologies were received through December 17, 2021. There are no plans to hold additional methodology workshops on the population and water demand projections. In addition to these workshops, the population and water demand projections were provided to utility stakeholders for review and where appropriate, feedback was incorporated. Included with this response is an attachment of the presentation that was given at both of the Technical Methods Workshops. If you are interested, the Technical Methods Workshops were also recorded, and this can be provided as well.</p> <p>Of note, there will be a separate Technical Methods Workshop, most likely fall/winter this year, which will discuss the modeling, evaluation criteria, and constraints, as well as a brief overview of the corresponding methodologies. In addition, a Regional Water Supply Planning Workshop will be held next year which will</p>

Appendix A

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				<p>discuss the results, projects, and potential solutions for meeting future water demands. Both of these workshops, which are required by Florida Statute, will provide the opportunity for stakeholder comments.</p> <p>If you would like detailed information regarding the methodologies for developing the population and water demand projections, as well as future reclaimed water supply and potential conservation estimates, a link to Appendix A (Population and Water Demand Projections) has been provided below. Also included in Appendix A, is the methodology for the spatial distribution of projected groundwater withdrawals that will be used in the groundwater flow model scenarios.</p> <p>https://www.northfloridawater.com/watersupplyplan/documents/Appendix-A.pdf</p> <p>2. As noted above, Appendix A includes the methodology used to develop the estimates of water conservation potential. A detailed explanation of the two conservation scenarios can be found on pages 15 and 16 of Appendix A.</p> <p>In summary, the First Scenario estimates potential conservation for all water use categories, except agricultural water use, using the approved 2020 CFWI RWSP</p>

Appendix A

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				<p>estimated water conservation potential (which is based on implementing best management practices) as a percent reduction. The FSAID VII Final Report (FDACS 2020) was used to estimate potential agricultural conservation savings. Additional information regarding these methods can be found on the respective websites below.</p> <p>CFWI Regional Water Supply Plan (cfwiwater.com) Agricultural Water Supply Planning / Water / Agriculture Industry / Home - Florida Department of Agriculture & Consumer Services (fdacs.gov)</p> <p>To provide a potential range of conservation for Public Supply and Domestic self-supply, the Second Scenario was developed, which reduces demand to reflect a gross per capita rate of no greater than the NFRWSP and District specific average 2014-2018 gross per capita rate.</p> <p>I hope this information helps to clarify your questions. Please do not hesitate to contact me if you have additional questions.</p>
5	Rob Denis, North Florida Utility Coordinating Group	6/16/2022 and 6/17/2022 via email	On behalf of the North Florida Utilities Coordinating Group, I would like to request an additional two weeks, until July 8, 2022, to review and provide comments or corrections on the newly published NFRWSP information	6/23/22 Email Response Sent In follow-up to our conversation last week, the timeframe to review and provide comment on the newly published NFRWSP information has

Appendix A

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			<p>cited below. Upon notification via your e-mail, we started reviewing this information and quickly determined that there is a significant amount of new information that merits additional time for a detailed review. For example, review of the well geodatabase file is a significant and important undertaking that by itself requires more than the allotted 2-week review period. The time constraint is compounded since newly published reuse and conservation estimates must also be reviewed concurrently.</p> <p>We appreciate your consideration of this request. Please give me call with any questions.</p> <p>Is documentation for the methodology used to develop the draft water reuse projections and water conservation scenarios available? It would be helpful to understand the basis for the data/projections in the spreadsheets that were posted and to provide additional context as we review the materials. Thanks.</p>	<p>been extended to July 8, 2022. We would appreciate feedback on any discrepancies found as they are discovered to facilitate our review of the geodatabase. And as we discussed, Appendix A includes the methodologies used to develop the draft water reuse projections and water conservation scenarios.</p> <p>Per our discussion, the documentation for water reuse projections and water conservation scenario methodologies can be found in Appendix A (link below). Included with this response is an attachment of the presentation that was given at the November 2021 Technical Methods Workshops.</p> <p>https://www.northfloridawater.com/watersupplyplan/documents/Appendix-A.pdf</p>
6	Tom Ridgik, City of Alachua Public Services	6/22/2022 via email	<p>We have attempted to update our projected water demand, but have some reservations to updating the applicable tables. This is because our projections are at large variance with the projected flows as shown on the table.</p> <p>As per your table (sorry, I don't know the table #), the City of Alachua actual water flow for 2020 is 1.24 MGD whereas the projected</p>	<p>6/27/22 Email Response Sent</p> <p>Thank you for your interest in reviewing our estimates and projections for the upcoming North Florida Regional Water Supply Plan (NFRWSP). We take your comments very seriously and intend to consider all feedback in a timely manner to meet our deadlines, therefore I would like to provide some</p>

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			<p>2045 flow is 1.44 MGD, which is only a 15% increase.</p> <p>GRU is the biggest utility in the area - for comparison, their analogous data for 2020 and 2045 are 22.06 & 27.29 MGD, respectively, which is a 23% increase.</p> <p>Our most recent water master plan provides City of Alachua flow projections. For 2020 & 2045, flows are 1.5 & 3.4 MGD, respectively, which is a large 126% increase!</p> <p>We hesitate to update the tables with these numbers, as there must be some sort of major difference in methodologies.</p> <p>Please contact us should you wish to discuss</p>	<p>clarification on the planning process and address your concerns.</p> <p>The base year estimates for the NFRWSP are 2014-2018 with projection estimates from 2020-2045, therefore the water use associated with year 2020 and beyond is a projection estimate. It is calculated by applying the average per capita rate from 2014-2018 to the projected population. The detailed methodology of how the 2014-2018 population was estimated is in Appendix A and starts on page 17.</p> <p>The Suwannee River Water Management District met with the City of Alachua in February 2021 to discuss the draft population estimates and projections and how they were compiled. The projected growth estimates are consistent with the Alachua County medium projected growth as published in the "Projections of Florida Population by County, 2020-2045, with Estimates for 2019" report from Bureau of Economic and Business Research (BEBR). This was the best available information at the time that the data was compiled (https://i-mail.bebr.ufl.edu/population/population-data/projections-florida-population-county-2020%E2%80%932045-estimates-2019).</p> <p>It was also discussed that if the City could submit a report, such as a Comprehensive Plan, to substantiate a higher growth rate or higher projection estimates than what was</p>

Appendix A

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				<p>currently estimated, we could take that into consideration when making revisions. This is consistent with our Regional Water Supply Plan Format and Guidelines. No follow up information from the City was received by the District to update these estimates.</p> <p>It is important to recognize that this information is being used in the five-year update to a regional water supply plan. For our planning purposes, we are trying to get a broad regional projection of what growth looks like for this area. Your utility will have additional opportunities during the consumptive use permitting or minimum flow or minimum levels prevention and recovery processes to provide more detailed information and request adjustments to the data.</p> <p>If there are concerns about the permitting process, you can reach out to David King, whom I have copied on this email. If you are interested in discussing in greater detail, I would be happy to sit down and go through the data.</p>
7	Tom Bartol, Jacksonville Electric Authority and Rob Denis, North Florida Utility Coordinating Group	6/29/2022 and 7/11/2022 via email	<p>Our observations/comments:</p> <ul style="list-style-type: none"> In review of the spreadsheet, SJRWMD projections were found to be lower than JEA's (Table 1 below) The main attributor to the difference in projected demand between JEA and SJRWMD is gallons per capita 	<p>7/1/22 and 7/8/22 Email Response Sent</p> <p>You noted in your email that there are differences between SJRWMD projections and JEA projected demand. In reviewing your comments, it became apparent you were referencing projections posted last year and not the projections posted on June 9, 2022,</p>

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			<ul style="list-style-type: none"> • JEA's method to calculate projected demand is based on trends from historical active service connections and gallons per connection for each water grid, SJRWMD projected demand is based on population projections and regional gallon per capita data • From the attached spreadsheet, the SJRWMD gallon per capita is based on “an average from 2014 - 2018 and is calculated as (Total Water Use / Total Estimated Population)”, no more information is given regarding the source of data • In 2021 the JEA average system wide gallon per capita number was 164 (Table 2 below), calculated using actual system demand and estimated population (source BEBR) at each active service point using geospatial analysis; in comparison the SJRWMD gallon per capita overall average for the JEA service area was calculated to be 129 (Table 3 below) • SJRWMD applies the same gallon per capita factor to historical populations, which comes out to a lower demand than was recorded and reported in the EN50 <p>Table 1 - Comparison of SJRWMD and JEA Water Demand Projections</p>	<p>that were revised in response to stakeholder comment (“Projections-20220425_edited” spreadsheet). The updated projections may address many of the concerns you identified.</p> <p>The methodology being used to develop the population and water demand projections for the North Florida Regional Water Supply Plan was presented in two Technical Methods workshops held in November 2021. Details on this methodology is described in Appendix A “Population and Water Demand Projections” which can be found on the North Florida Regional Water Supply Partnership (NFRWSP) webpage at: www.northfloridawater.com.</p> <p>Feedback, provided by utilities in the North Florida Utility Coordination Group, was incorporated into the methodology as described in the May 23, 2022, Technical Memorandum “Documentation and Methodologies for Updating St. Johns River Water Management District 2020-2045 North Florida Regional Water Supply Plan Projections Resulting from Stakeholder Feedback”. This Technical Memorandum has been added to Appendix A. In addition, data sources and pertinent information for utility water demand projections is also included in the footnotes of Table 5 and Table 5a of the “Projections-20220425_edited” spreadsheet, also located on the NFRWSP webpage. The water demand projections presented for the 2023 NFRWSP have taken into consideration</p>

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			<p>Table 1 - Comparison of SJRWMD and JEA Water Demand Projections</p> <table border="1" data-bbox="829 386 1234 581"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">SJRWMD Projection</th> <th colspan="2">JEA</th> </tr> <tr> <th>GW¹</th> <th>Other²</th> <th>Total</th> <th>Projection³</th> <th>Difference</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>106.88</td> <td></td> <td>106.88</td> <td>109.32</td> <td>-2.44</td> </tr> <tr> <td>2020</td> <td>113.14</td> <td>4.66</td> <td>117.80</td> <td>122.88</td> <td>-5.08</td> </tr> <tr> <td>2025</td> <td>118.66</td> <td>7.71</td> <td>126.37</td> <td>130.26</td> <td>-3.89</td> </tr> <tr> <td>2030</td> <td>123.79</td> <td>11.14</td> <td>134.93</td> <td>140.54</td> <td>-5.61</td> </tr> <tr> <td>2035</td> <td>128.93</td> <td>14.56</td> <td>143.49</td> <td>150.00</td> <td>-6.51</td> </tr> <tr> <td>2040</td> <td>134.06</td> <td>17.99</td> <td>152.05</td> <td>159.66</td> <td>-7.61</td> </tr> <tr> <td>2045</td> <td>139.19</td> <td>21.39</td> <td>160.58</td> <td>166.71</td> <td>-6.13</td> </tr> </tbody> </table> <p>¹GW = groundwater ²Other = alternative sources ³2015 and 2020 JEA are historical system demands, 2025-2045 from 2022 JEA Water Demand Projections ⁴units in mgd</p> <p>Table 2 - JEA 2021 System Summary</p> <table border="1" data-bbox="787 716 1304 894"> <thead> <tr> <th>Grid</th> <th>Estimated Population⁴</th> <th>Connections</th> <th>Water Demand, mgd</th> <th>Gallons per Connection</th> <th>Gallons per Capita</th> </tr> </thead> <tbody> <tr> <td>North</td> <td>320,455</td> <td>158,375</td> <td>47,759</td> <td>302</td> <td>149</td> </tr> <tr> <td>South</td> <td>398,844</td> <td>210,993</td> <td>68,846</td> <td>326</td> <td>173</td> </tr> <tr> <td>Nassau</td> <td>17,576</td> <td>12,009</td> <td>3,651</td> <td>304</td> <td>208</td> </tr> <tr> <td>Mayport</td> <td>400</td> <td>132</td> <td>0,056</td> <td>423</td> <td>140</td> </tr> <tr> <td>Ponte Vedra</td> <td>4,214</td> <td>2,345</td> <td>1,034</td> <td>441</td> <td>245</td> </tr> <tr> <td>Ponce de Leon</td> <td>1,679</td> <td>1,031</td> <td>0,383</td> <td>371</td> <td>228</td> </tr> <tr> <td>Total</td> <td>743,169</td> <td>384,885</td> <td>121,727</td> <td>316</td> <td>164</td> </tr> </tbody> </table> <p>⁴Population estimated from active service points and BEBR using a geospatial analysis ⁵Table is sourced from JEA 2021 system demands</p> <p>Table 3 - SJRWMD Projection</p> <table border="1" data-bbox="787 987 1304 1068"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="3">Duval</th> <th colspan="3">St Johns</th> <th colspan="3">Nassau</th> <th colspan="3">City</th> <th colspan="3">Overall</th> </tr> <tr> <th>Population</th> <th>mgd</th> <th>Demand</th> <th>Population</th> <th>mgd</th> <th>Demand</th> <th>Population</th> <th>mgd</th> <th>Demand</th> <th>Population</th> <th>mgd</th> <th>Demand</th> <th>Population</th> <th>mgd</th> <th>Demand</th> </tr> </thead> <tbody> <tr> <td>2010</td> <td>800,004</td> <td>139</td> <td>129.02</td> <td>24,923</td> <td>120</td> <td>15.77</td> <td>49,924</td> <td>188</td> <td>8.48</td> <td>12,200</td> <td>120</td> <td>1.20</td> <td>914,104</td> <td>120.00</td> <td>129.02</td> </tr> <tr> <td>2015</td> <td>859,785</td> <td>139</td> <td>128.33</td> <td>50,352</td> <td>120</td> <td>11.68</td> <td>53,799</td> <td>158</td> <td>4.39</td> <td>15,288</td> <td>120</td> <td>1.57</td> <td>979,424</td> <td>120.00</td> <td>128.33</td> </tr> <tr> <td>2020</td> <td>879,565</td> <td>139</td> <td>125.60</td> <td>56,619</td> <td>120</td> <td>13.78</td> <td>58,676</td> <td>178</td> <td>5.36</td> <td>18,291</td> <td>120</td> <td>2.35</td> <td>1,043,791</td> <td>120.00</td> <td>125.60</td> </tr> <tr> <td>2025</td> <td>910,348</td> <td>139</td> <td>118.00</td> <td>121,622</td> <td>120</td> <td>15.87</td> <td>62,528</td> <td>189</td> <td>6.29</td> <td>21,191</td> <td>120</td> <td>2.71</td> <td>1,105,147</td> <td>120.00</td> <td>118.00</td> </tr> <tr> <td>2030</td> <td>950,128</td> <td>139</td> <td>115.79</td> <td>130,241</td> <td>120</td> <td>17.06</td> <td>62,480</td> <td>198</td> <td>7.24</td> <td>24,152</td> <td>120</td> <td>3.11</td> <td>1,174,700</td> <td>120.00</td> <td>115.79</td> </tr> <tr> <td>2035</td> <td>989,910</td> <td>139</td> <td>119.86</td> <td>139,747</td> <td>120</td> <td>18.01</td> <td>69,897</td> <td>199</td> <td>8.18</td> <td>27,114</td> <td>120</td> <td>3.50</td> <td>1,239,708</td> <td>120.00</td> <td>119.86</td> </tr> </tbody> </table> <p>We believe the allocation of some of JEA's future water demand to "Other" is inappropriate.</p> <p>I understand that the SJRWMD's position is that JEA's current CUP and the amount of prevention/recovery credit of 142.26 mgd (with specific wellfield limits) is some sort of "cap" on JEA's groundwater use. However, this is inaccurate, unfounded and inconsistent with previous RWSP processes.</p>		SJRWMD Projection			JEA		GW ¹	Other ²	Total	Projection ³	Difference	2015	106.88		106.88	109.32	-2.44	2020	113.14	4.66	117.80	122.88	-5.08	2025	118.66	7.71	126.37	130.26	-3.89	2030	123.79	11.14	134.93	140.54	-5.61	2035	128.93	14.56	143.49	150.00	-6.51	2040	134.06	17.99	152.05	159.66	-7.61	2045	139.19	21.39	160.58	166.71	-6.13	Grid	Estimated Population ⁴	Connections	Water Demand, mgd	Gallons per Connection	Gallons per Capita	North	320,455	158,375	47,759	302	149	South	398,844	210,993	68,846	326	173	Nassau	17,576	12,009	3,651	304	208	Mayport	400	132	0,056	423	140	Ponte Vedra	4,214	2,345	1,034	441	245	Ponce de Leon	1,679	1,031	0,383	371	228	Total	743,169	384,885	121,727	316	164	Year	Duval			St Johns			Nassau			City			Overall			Population	mgd	Demand	Population	mgd	Demand	Population	mgd	Demand	Population	mgd	Demand	Population	mgd	Demand	2010	800,004	139	129.02	24,923	120	15.77	49,924	188	8.48	12,200	120	1.20	914,104	120.00	129.02	2015	859,785	139	128.33	50,352	120	11.68	53,799	158	4.39	15,288	120	1.57	979,424	120.00	128.33	2020	879,565	139	125.60	56,619	120	13.78	58,676	178	5.36	18,291	120	2.35	1,043,791	120.00	125.60	2025	910,348	139	118.00	121,622	120	15.87	62,528	189	6.29	21,191	120	2.71	1,105,147	120.00	118.00	2030	950,128	139	115.79	130,241	120	17.06	62,480	198	7.24	24,152	120	3.11	1,174,700	120.00	115.79	2035	989,910	139	119.86	139,747	120	18.01	69,897	199	8.18	27,114	120	3.50	1,239,708	120.00	119.86	<p>feedback from stakeholders and are now considered final for the 2023 NFRWSP.</p> <p>Regarding your comments concerning localized wellfield limits, District staff distributed projected groundwater demand based on specific wellfield allocations and sent these distributions out for stakeholder review on June 9, 2022. In your review of the revised projections and geodatabase, it should be noted that groundwater withdrawals were distributed to those counties within JEA's grid where it was available based on wellfield allocation limits. As such, the "Other" source is not needed anywhere in JEA's service area until 2035 and that is within Duval County.</p> <p>I hope this information is helpful and we look forward to working together through the NFRWSP. Please do not hesitate to contact me if you have additional questions.</p> <p>As we discussed yesterday, the North Florida planning region is distinct in that it is the only planning region where permittees voluntarily entered into a cost participation agreement for a water resource development project to address their respective impact to a Minimum Flows and Levels (MFLs) water body by purchasing "lift" and capping their groundwater allocations. As part of the terms of the Participation Agreement, JEA elected to participate in the Black Creek Water Resource Development project to address their impact</p>
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2010	800,004	139	129.02	24,923	120	15.77	49,924	188	8.48	12,200	120	1.20	914,104	120.00	129.02																																																																																																																																																																																																																									
2015	859,785	139	128.33	50,352	120	11.68	53,799	158	4.39	15,288	120	1.57	979,424	120.00	128.33																																																																																																																																																																																																																									
2020	879,565	139	125.60	56,619	120	13.78	58,676	178	5.36	18,291	120	2.35	1,043,791	120.00	125.60																																																																																																																																																																																																																									
2025	910,348	139	118.00	121,622	120	15.87	62,528	189	6.29	21,191	120	2.71	1,105,147	120.00	118.00																																																																																																																																																																																																																									
2030	950,128	139	115.79	130,241	120	17.06	62,480	198	7.24	24,152	120	3.11	1,174,700	120.00	115.79																																																																																																																																																																																																																									
2035	989,910	139	119.86	139,747	120	18.01	69,897	199	8.18	27,114	120	3.50	1,239,708	120.00	119.86																																																																																																																																																																																																																									

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			<p>Furthermore, even if the use of the “Other” source was acceptable, the way the “Other” source is applied is unreasonable. Instead of assuming that JEA could fully use its currently permitted allocation before an “Other” source was required, the projections assume that this “Other” source will be utilized as soon as 2020 in Clay and St. Johns Counties and 2025 in Nassau County due to localized wellfield limits. The application of these local limits is not appropriate since JEA may choose regulatory changes to address them. Furthermore, the use of localized limits results in JEA not fully utilizing its current allocation through the 2045 planning horizon, which is clearly not correct.</p> <hr/> <p>As a follow-up, can you please further explain the use of the “Other” source category for JEA? It does not appear that this category is used for any other water supplier or use type.</p> <p>I thought that the NFRWSP is supposed to estimate reasonable beneficial demands (regardless of source) for users in the region. Then the plan will evaluate, at a high level, if sufficient sources are generally available to meet those regional demands. As a result, I am unclear why a portion of JEA’s demands (and only JEA) were categorized as Other since that seems like a supply-side evaluation more suited for the regulatory arena.</p>	<p>to the MFLs for Lakes Brooklyn and Geneva. The extent to which JEA elected to participate addressed their proportionate share of impact from JEA’s 2014 – 2018 average water use for the existing recovery needed and also to address impact from JEA’s use over and above its 2014 – 2018 average water use based on a total allocation and distribution of groundwater withdrawals of 142.26 mgd. Since JEA elected to only offset their impacts resulting from the 142.26 mgd groundwater withdrawal, any estimated water demand greater than that is categorized for planning purposes as the “Other” source. We will include a definition of the “Other” category in Appendix A. These projections are for regional water supply planning purposes and do not limit JEA from pursuing regulatory options to satisfy additional demands above 142.26 mgd. The other participants are within their agreed upon demand, as outlined in their individual participation agreement, and therefore do not have a need to have any of their demand placed in the “Other” category.</p> <p>I hope this explanation is helpful.</p>

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			<p>Any additional information you can provide on the application of the “Other” source category for demand projections would be helpful. Thanks in advance</p>	
8	Rob Denis, North Florida Utility Coordinating Group	7/7/2022 and 7/28/2022 via email	<p>On behalf of the North Florida Utilities Coordinating Group (NFUCG), we have reviewed the recently published “Appendix A – Population and Water Demand Projections,” “NFRWSP Water Reuse Estimates and Projections” and “NFRWSP Water Conservation Scenarios” posted to www.northfloridawater.com. I am providing the comments below which are intended to improve the North Florida Regional Water Supply Plan by adding clarifications and providing better context to the results of these analyses. I’d appreciate an update on how the comments will be addressed once the water management districts have had a chance to review them. In the meantime, please let me know if you have any questions.</p> <p>Comments on “Appendix A – Population and Water Demand Projections,” “NFRWSP Water Reuse Estimates and Projections” and “NFRWSP Water Conservation Scenarios”</p> <ol style="list-style-type: none"> 1. On page 11 of Appendix A, please include a narrative to indicate that the “beneficial reuse” definition being used for the NFRWSP differs from the FDEP’s definition of reuse. A note to this effect is included in the tables of the NFRWSP Water Reuse Estimates and Projections, 	<p>7/27/22 and 9/26/22 Email Response Sent (Note: To facilitate review, the responses below are numbered to correspond with the questions in the email.)</p> <p>Thank you for your comments. Two Technical Methods workshops were held in November 2021, at which the methods for developing the water conservation potential and reuse estimates were presented. These comments and responses will be included in a “NFRWSP Comment/Response” appendix that will be made part of the 2023 NFRWSP.</p> <ol style="list-style-type: none"> 1. The following text will be included in Appendix A. The Florida Department of Environmental Protection (FDEP) regards several applications of reclaimed water as reuse that the St. Johns and Suwannee River Water Management Districts (Districts) do not. Therefore, it is common for the Districts’ beneficial reuse quantities to be lower than that of FDEP. The Districts require the application to achieve a water resource benefit in order to qualify as reuse. Reuse must take the place of an existing or potential use of higher-quality water or be used to grow useful crops,

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			<p>but is not readily apparent to the reader. This is an important clarification because one of the reuse projection methods relies on information on reuse from a FDEP document which utilizes different assumptions than those used by the St. Johns River and Suwannee River Water Management Districts (collectively, Districts).</p> <p>2. Please provide a page citation in the FDEP report for the statement, "The FDEP has a statewide reuse utilization goal of 75 percent." This statement is found on page 11 of Appendix A.</p> <p>3. Based on the tabulated information in the NFRWSP Water Reuse Estimates and Projections, the Districts estimate that an additional 56.81 mgd to 102.57 mgd of "reclaimed water for reuse" could be made available by 2045. We request that the NFRWSP include estimated costs for achieving these rates of additional reuse. Inclusion of the costs, even at a high-level or conceptual basis, would provide for a more complete picture of the feasibility of the projected reuse flowrates and document the financial investment required to make such flows available.</p> <p>4. It appears that the first water conservation method to estimate potential water use reductions by public supply customers was based on data from another part of</p>	<p>restore or maintain adopted minimum flows and/or levels of a river, lake, or wetland, or effectively recharge a useable aquifer. An application that does not meet any of these criteria is considered by the Districts to be disposal. Reclaimed water applications considered to be reuse by FDEP but disposal by the Districts are underground injection, absorption fields and rapid infiltration basins located in discharge areas, surface water augmentation where not required, spray fields, and artificial wetlands. Reclaimed water applications for underground injection, absorption fields and rapid infiltration basins will be considered beneficial if they are located in recharge areas, as identified via studies or through consumptive use permitting.</p> <p>2. The following citation will be included in Appendix A.</p> <p>FDEP. 2003. Water Reuse for Florida: Strategies for Effective Uses of Reclaimed Water. FDEP, Tallahassee, FL. Available from: http://www.dep.state.fl.us/water/reuse/docs/valued_resource_FinalReport.pdf</p> <p>3. The expansion of reclaimed water use will be a critical component in the sustainability of the water resources in the North Florida region. Typically for planning purposes, the amount of WWTF</p>

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			<p>the state (Central Florida Water Initiative [CFWI] area) and not local analysis specific to the Partnership area. These data should be used with caution as CFWI analysis found that conservation estimates were highly dependent on the specific housing characteristics of a county or region.</p> <p>In addition, the second method described appears to be more of a “what-if” type analysis, and less of an analysis to define a feasible amount of water conservation. Specifically this analysis assessed WHAT would be the regional reduction in water use if all public supply utilities with a gross per capita greater than the average 2014-2018 gross per capita, reduced their use to reflect their respective Districts’ average 2014-2018 gross per capita. While this may be possible, no analysis is provided to justify the feasibility.</p> <p>These methods may be reasonable for a water supply plan only if paired to an estimated cost to achieve these levels of conservation. The 2015 CFWI RWSP documents identified a cost of \$122,170,000 to achieve 27.91 mgd of public supply water conservation. We request that the NFRWSP include estimated costs for achieving public water supply</p>	<p>flow in the baseline year not being utilized beneficially is multiplied by 75 percent and this amount is considered as potential existing additional reclaimed water that could be used for beneficial reuse. When determining how much WWTF flow can be utilized, it is recognized that each WWTF is unique and items such as system upgrades and treatment, additional storage, expansion of system, customer availability, the cost-benefit of reuse as compared to developing other alternative water supplies, and other factors have to be taken into consideration. The Districts will continue to work with stakeholders through the planning process to identify feasible reclaimed water projects (and their associated costs) for inclusion in the 2023 NFRWSP.</p> <p>4. Continued investment in water conservation is critical to help the North Florida regional water supply planning area meet its future water needs and avoid unacceptable water resource impacts. The Districts used two methods to gauge the future benefit of effective conservation in the North Florida planning area. The First Scenario was based on the low-end estimates of potential conservation (based on implementing widely used best management practices) for all water use categories, except agricultural water use, using the approved</p>

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			<p>conservation at the estimated 20.15 mgd to 38.91 mgd.</p> <p>Furthermore, we do not believe that these methods are appropriate for use in regulatory or rulemaking actions to determine the amount of water conservation which may be feasible for a public supply utility. In that case, specific analysis is required to determine a feasible amount of water conservation.</p> <hr/> <p>Thanks Lori. I appreciate your efforts to provide these responses and will forward them on.</p> <p>I have a quick follow-up on question #2 because we have the FDEP document. However, the original question was on what page in that document is the “statewide reuse utilization goal of 75 percent” found? We can’t find it and have been asked.</p>	<p>2020 CFWI RWSP. To provide a potential range of conservation for Public Supply and Domestic self-supply, Scenario 2 was developed, which reduces demand to reflect a gross per capita rate of no greater than the District specific average 2014-2018 gross per capita rate for the NFRWSP.</p> <p>Achieving actual long-term improvements in water use efficiency will require a combination of water conserving irrigation and landscape designs, advanced technologies, best management practices, and other water conservation measures. Water conservation programs often are among the lowest cost solutions to meet future water demands and can reduce costs over the long term if properly planned and implemented. The Districts will continue to work with stakeholders through the planning process to identify feasible conservation projects (and their associated costs) for inclusion in the 2023 NF RWSP.</p> <hr/> <p>Thanks for reaching out. We are still working on assessing the water resource constraints for the region and plan to have draft results to share with stakeholders later this fall. The schedule on the NFRWSP webpage is still accurate.</p> <p>I also want to apologize for not getting back with you sooner on a previous question you had on what page in the document is</p>

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
				<p>the “statewide reuse utilization goal of 75 percent” found.</p> <p>The 75% statewide reuse utilization goal and projections methodology for potential reclaimed water flows to be made available for potential projects has been used in multiple stakeholder and Governing Board Approved Regional Water Supply Plans and associated appendices. Pages 39 to 41 of the 2003 FDEP report, which recognize “Southwest Florida Water Management District’s Activities – A Model” / “The Southwest Florida Water Management District has been a leader in the water reuse arena...” and from which the goal being used is derived as a strategy for the effective use of reclaimed water and water reuse for Florida. The citation to the 2003 FDEP report has been included on page 11 of Appendix A.</p> <p>https://floridadep.gov/water/domestic-wastewater/documents/water-reuse-florida-strategies-effective-use-reclaimed-water</p> <p>This goal is also referenced in FDEP’s 1991 guidelines for reuse feasibility studies that are required for facilities located within a designated Water Resource Caution Area - “Guidelines for Preparation of Reuse Feasibility Studies for Applicants Having Responsibility for Wastewater Management”. The 75% goal is listed as a condition of a master plan that makes it acceptable in lieu of</p>

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
				<p>the requirement for a reuse feasibility study (page 1).</p> <p>https://floridadep.gov/water/domestic-wastewater/content/reuse-feasibility</p>
9	Dennis Price, Resident White Springs, Florida	11/16/2023 SJRWMD Constraint Workshop Verbal Comment	<p>Mr. Price asked the following questions:</p> <ol style="list-style-type: none"> 1. Do we take into account the current condition of wetlands in our assessment? 2. Who receives the project solicitation letters? 3. How do we justify new water use along the coast by JEA in Nassau County? 4. He also commented that the region needs major aquifer recharge projects. 	<ol style="list-style-type: none"> 1. The purpose of the wetlands assessment performed in support of the NFRWSP is to evaluate the potential for adverse change due to projected increases in groundwater withdrawals. Current conditions of wetlands are caused by a multitude of factors and are evaluated as part of Consumptive Use Permit application review. 2. Project solicitation letters were sent to permittees in the North Florida planning area. Additionally, emails were sent to over 250 stakeholders in region and details of project submission were posted on the NFRWSP webpage. 3. Applications for new uses of water must ensure there is no interference with other water use permit holders (Chapter 40C-2, F.A.C.). Most utilities have existing allocations within their permits that provide for growth within their service area. 4. Several aquifer recharge projects were submitted for inclusion in the NFRWSP (see Appendix K)

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
10	Rob Denis, North Florida Utility Coordinating Group	1/30/2023 via email	<p>We agree with the primary conclusion that potential water quality degradation is a localized issue that has been effectively addressed by wellfield management. However, we would suggest additional clarification regarding the text on page 13, which states, "It should be noted that the major public supply utilities in Flagler and Duval counties have developed or are proposing to develop additional wellfields in less susceptible areas further inland." We would suggest that the statement be clarified because, as written, it could be inferred that all major public supply utilities in those counties have or are developing such wellfields to reduce the potential for water quality degradation. We do not know how many water users have completed or are contemplating such actions, but if it is very few, additional context should be added to the sentence. We would also suggest elimination of the term "major public supply utility" since its meaning is unclear and the use of a term like "water user" or "CUP permittee" would be clearer.</p>	<p>Language has been added to Appendix D to clarify that not all public supply utilities are developing additional wellfields.</p>
11	Rob Denis, North Florida Utility Coordinating Group	1/30/2023 via email	<p>The memo describes an analysis to quantify the potential for adverse changes to wetlands due solely to model predicted groundwater level changes associated with projected pumping. However, throughout the document, there are several locations that could give the reader a misleading impression about the analysis. We recommend rewording in several locations to ensure that the analysis and its</p>	<p>Language has been added to the Introduction Section of the 2022 Kinser-Minno Wetland Assessment Tool to clarify that the analysis assesses the potential for adverse change to existing wetlands only due to predicted changes in groundwater levels resulting from projected increases in groundwater demand.</p>

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			<p>results are accurately described. We have provided some suggested edits in underline and strikethrough as follows:</p> <p>Page 2, Introduction: “Therefore, this analysis focused exclusively on assessing the <u>potential for adverse change to existing wetlands due solely to projected increases in groundwater demand without consideration of other factors.</u>”</p> <p>Page 2, Background: “The Kinser-Minno method provides an estimation of the magnitude (acres), degree (high vs. low), and spatial distribution of the potential future adverse change to wetlands throughout the District <u>due solely to projected groundwater pumping.</u> The GIS model conducts a matrix analysis utilizing conditional statements dependent on soil permeability, sensitivities of plant communities to dewatering, and projected modeled declines in the surficial aquifer (SA) <u>due to projected pumping</u> to estimate the potential adverse change to individual plant communities that may occur if future water demands were met with traditional sources. <u>The GIS model does not incorporate numerous other factors that could increase or decrease the potential for adverse impacts to wetlands.</u>”</p> <p>Page 3, Results of the CP to 2045 Assessment: “The analysis identified a total of 8,067 acres of wetlands with a moderate to high potential for adverse change based</p>	

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			solely on increased groundwater withdrawals between CP and the 2045 projection”	
12	Stacie Greco and Stephen Hofstetter, Alachua County Environmental Protection Department	1/30/2023 via email	Water use projections and estimates do not include water use from landscape irrigation wells for properties that fall within public supply service areas. EPD analyzed a GIS layer of wells (2010 and up) within the SRWMD portion of Alachua County. Well data was combined with water use data to identify single family parcels that have a well in addition to water service provided from Gainesville Regional Utilities within the SRWMD. Just in this small area alone we suspect there are close to 150 landscape irrigation wells that are currently in use and not accounted for in the water supply plan and projections. Additional unaccounted use is likely occurring within the service areas of the other utilities with the MFL boundary area.	This comment has been taken into account. The Districts are working with the University of Florida to estimate water use due to landscape irrigation in the GRU service area. In preparation for the next update to the NFRWSP, the Districts will use the information from this study to evaluate the impacts caused by landscape irrigation wells.
13	Stacie Greco and Stephen Hofstetter, Alachua County Environmental Protection Department	1/30/2023 via email	Additionally, the UF Program for Resource Efficient Communities has aggregated 2021 household water use data for GRU customers by the year the house was built (Figure 1). The figure shows that houses built since the 1990s, when installation of permanent in-ground irrigation systems became the norm, had significantly higher 2021 water use compared to homes built prior to the nineties, therefore prior to the widespread use of irrigation systems. New homes are using on average almost 400 gallons per day compared to the historic ~150 gallons per day for houses built before 1995. EPD reviews applications	The SRWMD met with utilities to discuss population projections and future water demand. The goal of these meetings was to capture the best estimate of future population growth within the public supply service areas. The information provided by utilities was incorporated into the projected population estimates. Additionally, for the NFRWSP, the Districts based the water demand projections for public suppliers on the most recent five-year average gross per capita rate (2014-2018). This was to account for annual variations in water use due

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			<p>for new irrigation systems and it is now common for new construction in Newberry, Alachua, and High Springs to also include permanent in-ground irrigation. It is likely that similar trends are occurring in Lake City and in other urbanizing areas within the basin. If these utilities are projecting future water use based on historic use, they are likely underpredicting use.</p>	<p>to climate variations and implementation of water conservation programs. The use of gross per capita is recognized as a national standard methodology for water supply planning.</p> <p>However, this practice assumes that past water use is predictive of future water use and incorporates the current economic conditions and current rates of reclaimed water use and water conservation into the future projections.</p> <p>Many factors such as water conservation measures, landscape irrigation, and increases in multifamily housing occupancy can affect the gross per capita rates. These factors that affect gross per capita rates and public supply water demands will be captured during future water supply plan updates</p>
14	<p>Stacie Greco and Stephen Hofstetter, Alachua County Environmental Protection Department</p>	<p>1/30/2023 via email</p>	<p>The NFRWSP and MFL Prevention and Recovery Plans rely heavily on projects to restore flow. Projects can be unpredictable and often underperform. Strong water conservation requirements and regulatory strategies are needed, as demonstrated by the sheer fact that we have 73 adopted MFLs in the planning area, many of which continue to not meet the goals of the program. This is especially important since items 1 and 2 above illustrate how water use may be underestimated.</p>	<p>The Districts agree that water conservation is a priority. The planning process includes water conservation projects. Regulatory measures associated with an MFL recovery would be included in the Recovery Strategy which is appended to the water supply plan.</p>
15	<p>Stacie Greco and Stephen</p>	<p>1/30/2023 via email</p>	<p>Appendix E lists the MFLs in the water supply planning area. Lake Wauberg was not</p>	<p>Lake Wauberg was classified as having insufficient data due to the need for surface</p>

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
	Hofstetter, Alachua County Environmental Protection Department		<p>included in the NFRWSP because of “insufficient data.” Please expand on what data is needed to incorporate this water body in the NFRWSP. Lake Wauberg provides important recreation opportunities in Alachua County with access at UF’s Lake Wauberg facility and Paynes Prairie Preserve State Park. Alachua County EPD may be able to assist with obtaining necessary data.</p> <p>Appendix E also states that Col101974 and Gil1012973 were not included in the NFRWSP. Why were these springs left out of the plan?</p>	<p>water model development or update. Given the location of Lake Wauberg within an area of projected UFA drawdown, this system will be prioritized for model development before completion of the next NFRWSP. Note that Lake Wauberg is in an area of similar projected UFA drawdown to nearby systems that are being assessed, helping ensure protection of this region from consumptive use impacts. Language has been added to Appendix E indicating that these waterbodies will be prioritized for model development before completion of the next NFRWSP.</p> <p>Pg. 3 of Appendix E: “Additionally, COL101974 – Unnamed and GIL1012973 (Siphon Creek Rise) were not assessed because they are resurgences.” This error has been corrected to read that Columbia Spring was not assessed because it is a resurgence. COL101974 was assessed based on the adopted Lower Santa Fe Recovery Strategy.</p>
16	Stacie Greco and Stephen Hofstetter, Alachua County Environmental Protection Department	1/30/2023 via email	Appendix F states that the adopted Prevention and Recovery Plan for the Lower Santa Fe and Ichetucknee will be incorporated into the Water Supply Plan, as it includes actions for recovery. Almost nine years have passed since this plan was published (April 2014). It would be prudent to evaluate the projects from Appendix A to determine the effectiveness of completed projects and to determine the feasibility and expected effectiveness of projects that have not been completed.	The Districts reviewed projects completed to date in support of the LSF1 recovery strategy as a part of the water supply plan update. This information is presented in Chapter 7.

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
17	Paul Still, Bradford Soil and Water Conservation District	1/31/2023 via email	The MFLs for the Upper Santa Fe River were established in 2007 with levels set at the Graham and Worthington Springs gauges on the Upper Santa Fe River. The Upper Santa Fe River was determined to be in Recovery. In 2007 there was no statutory requirement to adopt a Recovery or Prevention plan at the time of the adoption of the Upper Santa Fe River MFL and it therefore does not have a Recovery Plan.	The Upper Santa Fe River was not determined to be in Recovery, according to the MFL set in 2007.
18	Paul Still, Bradford Soil and Water Conservation District	1/31/2023 via email	The determination that the Upper Santa Fe River MFLs were not being met resulted in the determination that the Upper Santa Fe Basin is in a Water Resource Caution Area. This designation places restrictions on water use permits in the Upper Santa Fe Basin and adds costs to potential and future water users.	The designation of the Upper Santa Fe Basin as a Water Resource Caution Area is based on regional constraints including the Lower Santa Fe and Ichetucknee Rivers and Lakes Brooklyn and Geneva.
19	Paul Still, Bradford Soil and Water Conservation District	1/31/2023 via email	The current Constraints Document indicates the Upper Santa Fe River MFLs at Graham and Worthington Springs are being met and will be meet. How was this determination made? If it is correct the Water Resource Caution Area designation should be removed. The impact of the finding that the Upper Santa	The determination was made by assessing flow changes in the NFSEG model. See Appendix F for more details. The Water Resource Caution Area designation was made because there are other water resource constraints in the NFRWSP area.
20	Paul Still, Bradford Soil and Water Conservation District	1/31/2023 via email	<p>The BSWCD request that the significance of the finding that the Santa Fe River MFLs are being meet be addressed in the Constraints Document.</p> <p>The BSWCD also request that fact that the Upper Santa Fe MFLs have not be revised since their adoption in 2007 be addressed in the Constraints Document.</p>	<p>The status of the Upper and Lower Santa Fe River MFLs have not changed with this planning document.</p> <p>The SRWMD's MFL priority list is updated and approved annually by the Governing Board, which would be an appropriate time to request MFL re-evaluation for specific waterbodies.</p>

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
				<p>The priority list is based on the importance of the waters to the state or region and the potential for significant harm to the water resources per statute.</p> <p>MFLs are typically considered for re-evaluation when new data and analytical techniques would allow for an improved MFL evaluation.</p>
21	Paul Still, Bradford Soil and Water Conservation District	1/31/2023 via email	<p>Flow from the Sampson River contributes about 20% of the flow at Worthington Springs. The MFLs for Lakes Sampson, Crosby, and Rowell provide a way to assure the flow from the Sampson River.</p> <p>The MFLs for Lakes Sampson, Crosby, and Rowell were to be established in 2016. The establishments date was later moved to 2018. The 2019-2020 MFL Lists indicates the MFLs for Lakes Sampson, Crosby, and Rowell to be adopted after 2022.</p> <p>Three waterbodies planned to have new MFLs established after 2023 were removed from the Priority List. These waterbodies are Lake Crosby, Lake Rowell, and Lake Sampson all located in Bradford County. Structural modifications are being investigated by the United States Army Corps of Engineers that may impact water levels and will not be completed in the next five years. The logic in the September 30, 2020, Memo appears to be the reverse of what should have been done because any plans the United</p>	<p>The SRWMD's MFL priority list is updated and approved annually by the Governing Board, which would be an appropriate time to request MFL re-evaluation for specific waterbodies.</p> <p>The priority list is based on the importance of the waters to the state or region and the potential for significant harm to the water resources per statute.</p>

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			<p>States Army Corps of Engineers would have proposed would have to be evaluated for their impact on the MFLs for the three lakes. The completion of the MFLs should have been advanced not deleted.</p> <p>The United States Army Corps of Engineers limited study has been completed and no structural modifications appear to have been recommended.</p> <p>The end result of the memo is the MFLs for the three lakes are not on the priority list.</p> <p>There is a water level control structure at Sampson that controls the level of the 3 connected lakes. That control structure has an operation plan that dictates when the structure can be operated. That plan was supposed to be revaluated when the MFL for Lake Sampson was adopted. The operation and maintenance of the control structure by Bradford County determines the flow down the Sampson River.</p> <p>It is not clear if a normal highwater level has been set for Lake Sampson. The MFL and the control structure operation plan are critical elements in determining the normal highwater level.</p> <p>The BSWCD requests that The Constraint Document should include a discussion about the lack of MFLs for Lakes Sampson, Crosby, and Rowell and request the MFLs for the</p>	

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			three lakes be established as soon as possible.	
22	Chris Farrell, Audubon Florida	1/31/2023 via email	Appendix D discusses water quality concerns from saltwater intrusion. There should also be a discussion of how decreased water levels may impact water quality around springs. This includes altered water quality in surface waters due to reduced spring flow as well as possible impacts to aquifers from reverse flow if springs run dry and allow surface water to enter the aquifer.	The SRWMD is actively investigating this. There is ongoing work with the University of Florida to evaluate the relationship between water quality and spring flow.
23	Chris Farrell, Audubon Florida	1/31/2023 via email	Appendix E states that only 20 of the 48 lakes with MFLs in the SJRWMD portion of the study were assessed for potential impacts. 4 do not have a strong connection to the Floridan aquifer, leaving 24 lakes that are unable to be assessed properly with current data and tools. This is a significant number, and we advise taking a conservative approach when considering these MFLs as a constraint since the actual impact may be greater than anticipated due to the incomplete analysis.	As stated in the Appendix E, many of the non-assessed lakes are located in one relatively small area in southern Putnam County. Many of these non-assessed systems are adjacent to assessed waterbodies, helping to provide regional protection from consumptive use impacts. This approach is considered conservative because MFLs systems being assessed are in areas with higher projected UFA change, and the majority of those systems are meeting their MFLs. Also, many of the MFLs waterbodies that are not assessed are in areas of similar projected UFA drawdown with those that are assessed and meeting their MFLs. However, some systems that are not assessed are in areas of high projected change and do not have adjacent assessed MFLs systems. Language has been added to Appendix E indicating that these waterbodies will be prioritized for model

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
				development before completion of the next NFRWSP.
24	Chris Farrell, Audubon Florida	1/31/2023 via email	Appendix F shows many river and spring locations that are anticipated to be in “recovery” status in 2045. Several of the springs are Outstanding Florida Springs and are locations of great social and natural significance. Recovery of these systems depends not only on the elimination of further groundwater withdrawals but the implementation of projects to restore historic groundwater levels.	The Regional Water Supply Planning effort addresses this. We are seeing that current and future water demands are not sufficient, therefore projects identified in Chapter 7 and Appendix K will meet future demands.
25	Chris Farrell, Audubon Florida	1/31/2023 via email	Appendix H is also very concerning, showing over 20 springs and rivers that exceed the 10% reduction in flow screening criterion and would likely suffer significant harm from anticipated groundwater withdrawals. Further, many of these water bodies already experience reduced flows; care is needed to avoid thinking a reduction below 10% is acceptable when the “current condition” baseline has changed over the years. In the revised draft it would be useful to show the actual reduction in flows expected for each water body beyond a simple “yes” or “no” evaluation of exceeding the criterion.	This comment has been addressed. See Appendix G for details. Project options identified in Chapter 7, as well as the adopted Recovery Strategies are meant to address the impacts of these waterbodies.
26	Chris Farrell, Audubon Florida	1/31/2023 via email	It is also noteworthy that MFL discussions are based on the concept of “significant harm.” Lowered water levels that produce harmful impacts (those that take less than 2 years to	Section (s.) 373.042, F.S., directs that MFLs be set to prevent significant harm. The planning process has project options,

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			recover from) are also undesirable and planning efforts should work to avoid making these conditions more frequent among waterbodies in the region.	identified in Chapter 7 that could be implemented to avoid significant harm.
27	Chris Farrell, Audubon Florida	1/31/2023 via email	Appendix I indicates that over 8,000 acres of wetlands have a moderate to high potential for impacts under future demands and that acreages scoring “low” were not presented. The revised draft should explain the differences between the categories and what they represent (i.e., what does a “moderate” or “high” potential for adverse change mean?). Do these results speak just to the potential for change or to the severity? It would also be interesting to include the results for the “pumps off” to “current pumping” scenario to explore the idea of cumulative impacts that wetlands face from groundwater withdrawals. In any case, greater than 8,000 acres of wetlands having a moderate or better potential for adverse change is another constraint that emphasizes the need for alternatives to groundwater pumping.	Appendix H was clarified to address these comments. The purpose of this appendix (Appendix H) was to look at the potential for adverse change, therefore the past scenario was not the focus of the document. The focus is to plan for future change.
28	Chris Farrell, Audubon Florida	1/31/2023 via email	Taken together, the constraints of chlorine levels, MFL conditions, and wetland function provide convincing data that groundwater withdrawals are no longer a feasible method for meeting future water needs. Instead, the updated water supply plan should emphasize the necessity for conservation and alternative water supply projects. Groundwater may seem like the least costly alternative, but the externalized costs to our water resources,	Yes, this is why we have regional planning in this area.

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			<p>tourism-based economy, real estate values, and wildlife make it the least sustainable alternative.</p>	
29	John Quarterman, Suwannee Riverkeeper/WW ALS	1/31/2023 via email	<p>I have some issues with another level. I noticed repeated assertions in the public meeting that demand or projected demand are just taken as givens. So basically anybody who wants to build a golf course, or start another titanium mine, or plant almond trees that need lots of water, that's just a given, that's demand.</p> <p>It seems strange.</p> <p>You've gone to a great deal of trouble to compile a water budget in the sense of here's evapotranspiration, here's aquifer recharge, and so forth.</p> <p>But all we see for a plan to deal with that is changing MFLs. Which seems to translate to lowering the limits for the water levels.</p>	<p>The projected future water demands are intended to capture the complete picture of the amount of water that is needed to meet future water demands.</p>
30	John Quarterman, Suwannee Riverkeeper/WW ALS	1/31/2023 via email	<p>I didn't see anything about planning to limit or review use permits for water withdrawal.</p> <p>I hope that there may be some change in course possible at this point. Because I really wouldn't want all your hard work to just go towards further reducing MFLs and decreasing water levels for the springs and rivers.</p>	<p>Regulatory measures associated with an MFL recovery would be included in the Recovery Strategy which is appended to the water supply plan. See Appendix L.</p> <p>The Districts reviewed projects completed to date in support of the LSFJ recovery strategy as a part of the water supply plan update.</p>

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
			<p>I know I heard something about, well, that's the regulatory arm. But this plan includes aquifer recharge projects, such as I believe there's a 48-inch pipe planned to go from the Suwannee River to recharge the Ichetucknee headsprings. See Appendix J from 2016. https://northfloridawater.com/watersupplyplan/documents/draft/Appendix_J.pdf More detail: https://wwals.net/?p=15981</p> <p>Four years later, SRWMD added a plan for another such pipe, from Branford. https://wwals.net/?p=55981</p> <p>There are much simpler ways to recharge the aquifer than these very expensive water pipelines, as Practicing Geologist Dennis J. Price pointed out back in 2016. https://wwals.net/?p=54126 Drill wells at the bottom of planted pine ditches.</p> <p>Planning aquifer recharge water pipelines is a policy. A bad policy, but still a policy. Limiting permits is also a policy.</p> <p>Limiting new withdrawal permits and phasing down quantities of older permits should be in this plan.</p> <p>I brought this up six years ago, as did many other people, and it was basically shrugged off. Both districts just proceeded to pass the plan as is.</p>	

Appendix A

NFRWSP Comment Number	Commenter and Association Entity	Date Received and Manner of Submittal	Comment As Received	NFRWSP Response
31	Vivian Katz, Save Our Lakes Organization, Inc. (SOLO)	3/7/2023 via e-mail	SOLO participated in current North Florida Water Supply Plan. In that process, we submitted several (12 or 13) projects. Those projects should still be in your system. Are any of these project options being considered?	Given the construction of the Black Creek Water Resource Development Project, previous SOLO projects are not being considered for inclusion in the 2023 NFRWSP.
32	Robert L. Knight, Howard T. Odum Florida Springs Institute	4/13/2023 via email	<p>The Florida Springs Institute would be happy to save you the time, effort, and expense of preparing an updated water supply plan. It really only needs to include three essential elements:</p> <ol style="list-style-type: none"> 1. Mandatory monitoring and reporting of all groundwater extractions in the District. 2. A cap on future groundwater withdrawals in the District with a minimum of 50% reduction of existing permitted groundwater pumping to allow a recovery of healthy surface water resources, including springs, rivers, and lakes in the District. 3. An equitable fee on all groundwater withdrawals with all proceeds utilized for conservation of natural landscapes in the District. <p>I can assure you these simple measures will go a long way to solving your current and future water supply challenges. If you wish to discuss, feel free to call.</p>	<p>Section (s.) 373.709, F.S., provides that the districts shall conduct water supply planning for a water supply planning region within the district identified in the appropriate district water supply plan under s. 373.036, F.S., where it determines that existing sources of water are not adequate to supply water for all existing and future reasonable-beneficial uses and to sustain the water resources and related natural systems for the planning period.</p> <p>Any regulatory measures, such as monitoring, reporting, restricting withdrawals, etc., would be included in a recovery strategy. Recovery Strategies that are adopted in the NFRWSP area are appended to the water supply plan. See Appendix L and M.</p>
33	Jim Gross, Florida Defenders of the Environment	4/13/2023 via email in response to Robert Knight	It would appear we abandoned the Three Prong Test quite some time ago.	See NFRWSP response to Robert Knight, Comment No. 32 above.