

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>

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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 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>

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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>

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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

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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>

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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> </tr> </thead> <tbody> <tr> <td>2020</td> <td>900,004</td> <td>139</td> <td>129.02</td> <td>24,923</td> <td>120</td> <td>15.77</td> <td>29,924</td> <td>138</td> <td>8.48</td> <td>12,200</td> <td>120</td> <td>1.20</td> <td>954,949</td> <td>217.00</td> <td>129</td> </tr> <tr> <td>2025</td> <td>889,785</td> <td>129</td> <td>108.33</td> <td>90,352</td> <td>120</td> <td>11.68</td> <td>33,799</td> <td>138</td> <td>4.39</td> <td>13,288</td> <td>120</td> <td>1.97</td> <td>977,424</td> <td>120.37</td> <td>129</td> </tr> <tr> <td>2030</td> <td>879,566</td> <td>120</td> <td>113.60</td> <td>96,819</td> <td>120</td> <td>13.78</td> <td>38,676</td> <td>138</td> <td>5.36</td> <td>18,291</td> <td>120</td> <td>2.35</td> <td>1,040,791</td> <td>134.03</td> <td>120</td> </tr> <tr> <td>2035</td> <td>859,348</td> <td>120</td> <td>118.00</td> <td>121,652</td> <td>120</td> <td>15.87</td> <td>43,553</td> <td>138</td> <td>6.20</td> <td>21,191</td> <td>120</td> <td>2.71</td> <td>1,103,147</td> <td>148.48</td> <td>120</td> </tr> <tr> <td>2040</td> <td>859,128</td> <td>120</td> <td>123.79</td> <td>125,241</td> <td>120</td> <td>17.06</td> <td>52,449</td> <td>138</td> <td>7.24</td> <td>24,192</td> <td>120</td> <td>3.11</td> <td>1,174,708</td> <td>153.00</td> <td>120</td> </tr> <tr> <td>2045</td> <td>869,920</td> <td>120</td> <td>129.86</td> <td>129,747</td> <td>120</td> <td>18.61</td> <td>59,897</td> <td>138</td> <td>8.18</td> <td>27,514</td> <td>120</td> <td>3.50</td> <td>1,239,788</td> <td>161.96</td> <td>120</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	2020	900,004	139	129.02	24,923	120	15.77	29,924	138	8.48	12,200	120	1.20	954,949	217.00	129	2025	889,785	129	108.33	90,352	120	11.68	33,799	138	4.39	13,288	120	1.97	977,424	120.37	129	2030	879,566	120	113.60	96,819	120	13.78	38,676	138	5.36	18,291	120	2.35	1,040,791	134.03	120	2035	859,348	120	118.00	121,652	120	15.87	43,553	138	6.20	21,191	120	2.71	1,103,147	148.48	120	2040	859,128	120	123.79	125,241	120	17.06	52,449	138	7.24	24,192	120	3.11	1,174,708	153.00	120	2045	869,920	120	129.86	129,747	120	18.61	59,897	138	8.18	27,514	120	3.50	1,239,788	161.96	120	<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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2020	900,004	139	129.02	24,923	120	15.77	29,924	138	8.48	12,200	120	1.20	954,949	217.00	129																																																																																																																																																																																																																									
2025	889,785	129	108.33	90,352	120	11.68	33,799	138	4.39	13,288	120	1.97	977,424	120.37	129																																																																																																																																																																																																																									
2030	879,566	120	113.60	96,819	120	13.78	38,676	138	5.36	18,291	120	2.35	1,040,791	134.03	120																																																																																																																																																																																																																									
2035	859,348	120	118.00	121,652	120	15.87	43,553	138	6.20	21,191	120	2.71	1,103,147	148.48	120																																																																																																																																																																																																																									
2040	859,128	120	123.79	125,241	120	17.06	52,449	138	7.24	24,192	120	3.11	1,174,708	153.00	120																																																																																																																																																																																																																									
2045	869,920	120	129.86	129,747	120	18.61	59,897	138	8.18	27,514	120	3.50	1,239,788	161.96	120																																																																																																																																																																																																																									

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			<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>

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			Any additional information you can provide on the application of the “Other” source category for demand projections would be helpful. Thanks in advance	
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,

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			<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>

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			<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>

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			<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>

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				<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>

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				<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)

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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>

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			<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>	

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			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

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			<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	Stacie Greco and Stephen Hofstetter, Alachua County Environmental Protection Department	1/30/2023 via email	<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	Stacie Greco and Stephen	1/30/2023 via email	<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>

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	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.

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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 met. 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 met 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>

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				<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>

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			<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>	

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			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

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				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,

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			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.

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			<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 LSF1 recovery strategy as a part of the water supply plan update.</p>

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			<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>	

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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.

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34	John Martin; City Manager, Hawthorne	9/20/2023 Draft 2023 NFRWSP SJRWMD Workshop Verbal Comment	<p>Summary:</p> <ul style="list-style-type: none"> • Thanked staff for work on the Plan • Intends to get City of Hawthorne more involved in the planning process • Has proposed projects that may help with goals of the Plan • Expressed that Hawthorne wants to be a steward of natural resources, including water, but that the means to do so are not always available 	<p>Thank you for your comment, the Districts appreciate the continued collaboration from the City of Hawthorne in the North Florida Regional Water Supply Plan process. Projects that have a water supply component will be considered for inclusion in the plan. The project submitted by the City has been included in the plan.</p>
35	Merrilee Jipson; riparian owner on the Santa Fe River; board member of Our Santa Fe River	9/20/2023 Draft 2023 NFRWSP SJRWMD Workshop Verbal Comment	<p>Summary:</p> <ul style="list-style-type: none"> • Concerned that O'lono Sink is being used as a recharge component for upstream activities. • Described atypical flooding on the lower Santa Fe River due to upstream influences, which may include releases of wastewater from holding ponds during storm events by Chemours and other companies. • Flooding occurred on the Santa Fe River before 2012; the river experienced some of the highest flooding on record in 2012 and 2017. • Flooding on the Santa Fe River during the hurricane of 2017 almost shut down I-75 and it was learned that large amounts of water were being released upstream • Described that water goes underground at O'lono Sink, but that we don't know where the water really goes. 	<p>Thank you for your comments. The 2023 NFRWSP is the result of a regional water supply planning effort and does not address possible atypical flooding events or the sufficiency of surface water / groundwater quality treatment programs. The Districts have robust environmental resource and consumptive/water use permitting programs to address construction and water use. The Florida Department of Environmental Protection has the authority to issue National Pollutant Discharge Elimination System (NPDES) permits and is the state agency that is responsible for ensuring water quality standards are met.</p>

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			<ul style="list-style-type: none"> • People living near O'leno Sink are developing autoimmune disorders and cancer. • Water quality or surface and groundwater needs to be addressed with projects due to health concerns; water need to be treated to drinking water standards. • We do not need more polluted stormwater being released into NPDES holding situations or other natural systems. 	
36	Rick Hutton; GRU and North Florida Utility Coordinating Group	9/20/2023 Draft 2023 NFRWSP SJRWMD Workshop Verbal Comment	<p>Summary:</p> <ul style="list-style-type: none"> • Thanked staff for the work done on the Plan. • Looks forward to working with the Districts and other stakeholders. 	Thank you for your comment, the Districts appreciate the continued collaboration.
37	Christy Carter; resident near Cecil Field and Camp Blanding	9/20/2023 Draft 2023 NFRWSP SJRWMD Workshop Verbal Comment	<p>Summary:</p> <ul style="list-style-type: none"> • Concerned about development of 17,000 houses near Trail Ridge dump and nearby mines. • Lives in a cancer cluster with multiple family members that have died or are afflicted by different types of cancer. • Has been to Chemours mine and seen acid being dumped into the water to make it clear. • Development of 5,000 acres of wetlands will directly affect North Fork Black Creek and Black Creek. 	Thank you for your comments. The 2023 NFRWSP is the result of a regional water supply planning effort and does not address possible atypical flooding events or the sufficiency of surface water/groundwater quality treatment programs. The Districts have robust environmental resource and consumptive/water use permitting programs to address construction and water use. The Florida Department of Environmental Protection has the authority to issue National Pollutant Discharge Elimination System (NPDES) permits and is the state agency that

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			<ul style="list-style-type: none"> • Trees were cut down at the dump that affected eagle habitat. • Endangered Black Creek crayfish were found dead in subdivision built near wetlands. • A lot coming to the community that is not being done in the right way. • Mining is out of control. 	<p>is responsible for ensuring water quality standards are met.</p>
38	Merrilee Jipson; riparian owner on the Sante Fe River; board member of Our Santa Fe River	9/21/2023 Draft 2023 NFRWSP SRWMD Workshop Verbal Comment	<p>Summary:</p> <ul style="list-style-type: none"> • Concerned about projects that might bring water into the lower Santa Fe river through O'lono State Park through O'lono sink. • On September 11th there was a huge spike at the Santa Fe River gage at Alligator Creek, and now seeing a lot of water coming into the upper/lower Santa Fe River • 2010, 2012, and 2017 hurricane events produced flooding from the upper Santa Fe River that we have never had before. • Locals say that the flooding always came from the Suwannee River, but now we are seeing it coming downstream from the upper part of the river. • Concludes that water is being released – possibly from mining interests on the ridge. Chemours and Dupont have been known to release water during storm events. In 2017, 40 or 70 million gallons of water were released, and I-75 was almost flooded 	<p>Thank you for your comments. The 2023 NFRWSP is the result of a regional water supply planning effort and does not address possible atypical flooding events or the sufficiency of surface water/groundwater quality treatment programs. The Districts have robust environmental resource and consumptive/water use permitting programs to address construction and water use. The Florida Department of Environmental Protection has the to issue National Pollutant Discharge Elimination System (NPDES) permits and is the state agency that is responsible for ensuring water quality standards are met.</p>

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			<p>due to excessive water on the upper Santa Fe River.</p> <ul style="list-style-type: none"> • An unexpected flooding spike was observed one month ago. • Through projects, if water is released in the Starke area, the New River, or Lake Sampson, water should be treated because we don't want the polluted water. • We are seeing health issues associated around the mining interests, including cancer near Clay Hill and Maxville (Black Creek project area). There is a cancer cluster in a generational family area here (near Gum Branch NPDES). • Is polluted water that is observed on Gum Branch waterway what we are seeing on the Santa Fe River? • The water that comprises the lower Santa Fe River three and a half miles from O'lono is not the same water that goes into the ground at O'lono. • Areas upstream of the O'lono system are treating the O'lono like deep well injection. O'lono should not be treated like a deep well injection. • Reiterated health concerns for people drinking potentially polluted groundwater from the O'lono system. 	
39	Richard Baker, Ph.D.; Pelican Island Audubon	9/14/2023 via email	Why not pass a law that only 20% of your yard can be in turfgrass. 64% of our drinking water goes on lawn. 84% in summer. Also need to save our trees.	The 2023 NFRWSP is a regional planning level effort and not a regulatory approach to define specific water conservation strategies. The Districts recognize the importance of

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				<p>water conservation and promote best management practices through our planning, cost-share, education and outreach, and regulatory programs. Outdoor residential water use (irrigation) remains a prime target for demand reduction, which includes efforts to reduce irrigated areas. The Districts work with local governments and utilities in North Florida to implement programming that best suits their area for reducing outdoor water use.</p>
40	Jacqueline Carey	9/17/2023 via email	<p>As more and more subdivisions are built and more people move in to our state I get more concerned about the quality and quantity of our available water.</p> <p>I think it should be a requirement that all new homes must put down artificial turf instead Of sod.</p> <p>This will stop the runoff of fertilizer etc. and cut down on water consumption.</p>	<p>The 2023 NFRWSP is a regional planning level effort and not a regulatory approach to define specific water conservation strategies. The Districts recognize the importance of water conservation and promote best management practices through our planning, cost-share, education and outreach, and regulatory programs. Outdoor residential water use (irrigation) remains a prime target for demand reduction, which includes efforts to reduce irrigated areas. The Districts work with local governments utilities in North Florida to implement programming that best suits their area for reducing outdoor water use.</p>
41	Charles Shinn; Florida Farm Bureau Federation	9/28/2023 via email	<p>On behalf of Florida Farm Bureau Federation and our 132,000 member families, many of whom live and farm in the boundaries of the North Florida Regional Water Supply Plan (NFRWSP) area, we appreciate the opportunity to comment on the draft version of the 2023 NFRWSP.</p>	<p>The Districts appreciate the feedback and continued collaboration with Florida Farm Bureau Federation and its members.</p> <p>The FSAID model incorporates both agronomic and economic factors that affect irrigation demand, which has enhanced the</p>

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			<p>We are pleased to read that the districts (SJRWMD and SRWMD) are collaborating on this plan to supply the projected increase of 135 mgd using non-traditional sources such as reclaimed water, SAS/IAS water sources, stormwater, and wellfield optimization. As technology improves during this time horizon, the cost per unit of water should certainly decrease. We also appreciate the effort by the districts to identify and cost-share water resource development projects by all sectors of water users. Utilizing the scientific basis developed by the University of Florida and other institutions, agriculture will continue to do their part to conserve and increase efficiency of water resources.</p> <p>It is important to note that water use in agriculture is entirely dependent on the climate and market conditions. Agriculture only needs to utilize water resources when the climatic conditions are not sufficient to meet the water demand by the crop. It is also important to note that during periods of excess climate conditions, all agricultural lands provide net recharge to the surface and aquifers, and it is important for this to be recognized in any water supply plan. Finally, cropping (varieties and timing) is fully dependent on marketing conditions that are beyond the scope of control by the farmer. A farmer must remain a state of profitability to remain on the land and they are only able to do so by producing and selling a crop for more than the cost of production. It should be noted</p>	<p>estimate of future irrigation demands. More details can be found in the FSAIDVII final report. Additionally, the FSAID product estimated future water demand for dry years (1-in-10). Water demand for 2045 during a 1-in-10 year drought is also included in Appendix B, Table B-7.</p>

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			<p>here that the cost of production includes any cost associated with irrigation and as such, irrigation efficiency is critical to profitability.</p> <p>We welcome any questions or comments and look forward to the continued collaboration as this plan is finalized.</p>	
42	Stacie Greco and Stephen Hofstetter; Alachua County Environmental Protection Department	10/2/2023 via email	<p>Alachua County is committed to protecting groundwater resources and continues to provide input on the North Florida Water Supply Plan and the Lower Santa Fe and Ichetucknee rivers Minimum Flows and Levels (MFLs). Below is a summary of our concerns with the NFRWSP materials that were released September 2023.</p> <p>1. The projected increase of 94.1 MGD in public supply for the St Johns River Planning area is unsustainable and illustrates the need to re-evaluate our current consumptive use permitting process and the definition of the Public Interest and Beneficial Use. The public supply increase of 4.5 MGD in the SRWMD portion of the planning region seems underestimated in light of the growth in these areas and the recent increase in the City of Newberry’s consumptive use permit. Many of the stakeholder comments in Appendix A echo our shared concern with the assumption that all future uses will be accommodated with little restrictions or demand reduction.</p> <p>2. Public supply water use projections and estimates do not include water use from</p>	<p>1. Regional water supply plans are not regulatory documents, therefore the review of the consumptive use permitting process is not in the scope of a regional water supply plan. Any regulatory measures would be addressed in recovery or prevention strategies. Based on current pumping conditions, constraints on the water resources in the North Florida region dictate that future use of groundwater may be more limited. A suite of projects, including water conservation, alternative water supply and aquifer recharge projects, were developed as part of this planning process to address this deficit in groundwater availability. In addition to implementation of projects, the District’s regulatory programs take into account these constraints when evaluating water use/consumptive use permits. The SJRWMD Water Use Regulation staff have worked with applicants and permittees in the North Florida region who submitted Consumptive Use Permit (CUP) applications achieve a net reduction of 30.0 mgd in permitted UFA</p>

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			<p>landscape irrigation wells for properties that fall within public supply service areas. While staff responded in Appendix A that this additional withdrawal from the aquifer will be included in the next update to the NFRWSP, it seems prudent and necessary to estimate this use now and account for it in this current plan before further damage occurs. The proposed study could then be used to refine this estimate in the future plan. On page 31 the plan discusses several factors that decrease per capita use and failed to mention the substitution of landscape irrigation wells for public supply irrigation. This important point should be included in the main document and on page 6 of Appendix B.</p> <p>3. While the Landscape Irrigation/Recreation category is not the biggest use in this region, it should be scrutinized during the consumptive use permitting (CUP) process and the next iteration of this plan. The plan shows a projected increase of 63% in this category, which is greater than the percent increase in agricultural and public supply demand. Alachua County EPD staff has reviewed several CUPs for landscape irrigation for commercial areas and does not see how this use is in the public interest. These landscapes tend to be established and can survive on rainfall alone. Public supply could be used for occasional watering needs in extreme droughts. Additionally, it is unclear if this category includes metered data and how accurate these projections are.</p>	<p>groundwater allocations since 2015. Additionally, the SRWMD staff has reduced groundwater allocations in the NFRWSP area by over 10 mgd since 2015, which is when the LSF1 recovery strategy was adopted. Permits will continue to be evaluated to determine whether existing allocations can be reduced. Typically, this evaluation occurs upon application for a CUP permit renewal or permit modification, or if recovery strategies require reevaluation of the permit at an earlier date.</p> <p>Additionally, the Districts met with utilities to review their projection estimates and revisions were made from the feedback received. Projects have been developed to address all future demands. The data used for the NFRWSP illustrates the best available information at the time the projections were developed. Any increases in population and water demand will be included in the next 5-year update to the NFRWSP.</p> <p>2. This comment has been acknowledged. The Districts have an active contract with the University of Florida to analyze usage patterns where irrigation wells are known, estimate the number of wells and quantity of water for areas with and without irrigation wells, and provide recommendations on how the data can be extrapolated to other areas. In</p>

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			<p>4. In January 2023, Alachua County pointed out that based on data from the UF Program for Resource Efficient Communities, new homes are using on average almost 400 gallons per day compared to the historic ~150 gallons per day for houses built before 1995. This means that utilities are projecting future water use based on historic use and are likely underestimating projected demand. In Appendix A staff recognized this issue and stated that the factors that influence public supply use will be incorporated in the future plan. Appendix M Brooklyn and Geneva Recovery Strategy relies on “passive water conservation” as plumbing fixtures get replaced with more efficient models. However, this concept does not hold true for outdoor water use which represents a large portion of public supply water use. Again, it is necessary to apply a buffer to allow for this uncertainty in water use projections so we don’t over allocate water in this region, as has happened in Central Florida.</p> <p>5. The NFRWSP and MFL Prevention and Recovery Plans rely heavily on projects to restore flow. Projects can be unpredictable, often underperform, and are dependent on limited funding. Several of the projects in the plan are infiltrating recharge wetlands which seem to not account for loss of water to evapotranspiration. While Alachua County supports recharge via infiltrating wetlands, we</p>	<p>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.</p> <p>3. Regional water supply plans are not regulatory documents, therefore the review of the consumptive use permitting process is not in the scope of a regional water supply plan. The purpose of the water use regulatory program is to ensure that those water uses permitted by the District are reasonable-beneficial, will not interfere with any presently existing legal uses of water, and are consistent with the public interest pursuant to Section 373.223, F.S. The process requires efficient utilization of water for the intended purpose to prevent and reduce wasteful, uneconomical, impractical, or unreasonable use of water resources. In addition, all economically and technically feasible alternatives to the use of traditional sources are considered, including, but not limited to, brackish water, reclaimed water, stormwater, and aquifer storage and recovery. Each District has adopted rules for regulating the consumptive use of water.</p> <p>The majority of the increase in Landscape Irrigation/Recreation (LR) category occurs within the SJRWMD</p>

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			<p>do not want the benefits to be overestimated in light of pressures on the aquifer.</p> <p>6. Strong water conservation requirements and regulatory strategies are needed in addition to projects. In response to such, staff references Appendix L Prevention and Recovery Plan in Appendix A. This plan was adopted almost a decade ago (2014) and the MFL is still not being met. Additional regulatory measures are needed and are much more reliable and cost effective compared to projects. For example, Appendix M Brooklyn and Geneva Recovery Strategy largely relies on the \$81 million dollar Black Creek project to achieve 10.0 MGD of recharge. Applying and enforcing once a week year-round irrigation restrictions would conserve more water at a fraction of the cost.</p> <p>7. Alachua County is in the process of completing a Climate Vulnerability Analysis for Alachua County. The data will be shared with your agencies and should be incorporated in this effort and future efforts to the greatest extent feasible. While most of the counties in this region will not have comparable data, it is likely that some of the results from Alachua could be extrapolated to incorporate the impacts of climate change on our water supplies.</p> <p>We appreciate the opportunity to share our concerns about these water resources that are vital to our local economy, ecology, and</p>	<p>(10.9 mgd or 96% of the increase). Of this, almost 74% of the projected increase in LR water demand is expected to come from surface water, not a public water supply system. Additionally, some of the increased demand can be met with reclaimed water. Regardless of source water, surface water or potable water, all uses are required to use water in the most efficient manner feasible.</p> <p>The water use estimates included metered data, however if there is not a reporting requirement, data is estimated based on information provided in the permit. More details have been added on page 2 in Appendix B to outline the Districts permitting requirements.</p> <p>4. As stated previously, the projected future demands were developed with utilities based on the best available information at the time. The use of gross per capita is recognized as a national standard methodology for water supply planning. The Districts based the water demand projections for public suppliers on the most recent five-year average gross per capita rate (2014-2018). The data used to develop the average regional gross per capita rate used for this plan was not indicative of the increase in water use by new homes. Water conservation and implementation of reclaimed water, occurring within utility service area</p>

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			<p>water supply. Please contact Stacie Greco, Water Resources Program Manager, at Sgreco@alachuacounty.us or 352-264-6829 for additional information.</p>	<p>boundaries, are resulting in reductions and offsets of residential irrigation from the potable supply, respectively. However, the trends of increased water use in new homes are of concern and additional water conservation strategies are being pursued such as working with UF/IFAS on more drought tolerant turf grass cultivars and promoting stormwater reuse in new developments.</p> <p>However, it is acknowledged that the projection methodology assumes past water use is predictive of future water use and other factors affecting per capita usage, such as newer homes using more water than older homes, are not immediately reflected in the five-year average. Projections will be reevaluated during the next 5-year update at which time any change of trends in water use patterns will be taken into account.</p> <p>5. Your comment has been noted. The Districts will continue to refine benefit estimates as projects are developed.</p> <p>6. The NFRWSP recognizes the importance of water conservation to help meet future demand, however regional water supply plans are not regulatory documents. Any regulatory measures would be addressed in updated recovery or prevention strategies.</p>

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				<p>7. The Districts do recognize that climate change poses uncertainty in water supply availability, and that local management actions and regional collaborations will help mitigate the associated impacts and enhance the continued reliability of water supply in the NFRWSP planning area. To plan and prepare for climate change, the Districts conducted a planning level assessment to determine if fresh water supplies in the NFRWSP region are likely to become constrained due to flooding from Sea Level Rise throughout the 20-year planning horizon consistent with the DEP's "Format and Guidelines for Regional Water Supply Planning" (a statement referencing these guidelines has been added to the plan). Individual entities, such as Alachua County, are conducting more detailed vulnerability assessments of their facilities that consider compound flooding and other relevant factors. Additional text was added to Chapter 5 of the plan to highlight the detailed analyses being conducted by local entities through their vulnerability assessment of critical infrastructure.</p>
43	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	The Bradford Soil and Water Conservation District's (BSWCD) comments are focused on Bradford County and the Upper Santa Fe Basin which includes almost all of Bradford County. A very small part of southeastern	This comment is acknowledged. The Districts have provided responses to the subsequent comments, which are related to these concerns.

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			<p>Bradford County is in the Upper Etonia Creek Basin.</p> <p>The BSWCD has three major concerns related to the Draft 2023 North Florida Regional Water Supply Plan (2020–2045) (Draft 2023 NFRWSP).</p> <ol style="list-style-type: none"> 1. The MFLs for the Upper Santa Fe River 2. The MFLs for Lakes Sampson, Crosby, and Rowell have not been established 3. The methods used in the Draft 2023 NFRWSP to determine the impacts of mining. 	
44	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>The MFLs for the Upper Santa Fe River</p> <p>The methods used to first establish the MFLs for the Upper Santa Fe Basin and the methods used to determine if the MFLs are being met have very serious flaws. These flaws need to be addressed by reevaluating the Upper Santa Fe MFL adopted in FAC 40B-8.061 in 12-10-07 and revising the method used to determine if the MFLs are being met currently and will be met in the future.</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.
45	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>Establishing MFLs</p> <p>The current method of establishing MFLs for small streams has a significant problem because the flow in small streams can be reduced by trees falling across the stream, debris trapped on the fallen trees, and sediment accumulation. The reduced flows</p>	Your comment has been acknowledged.

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			<p>result in higher water levels up stream. If the flow reduction is near the measuring gauge the data collected from that gauge would not accurately reflect the level and flow of the river below the point where flow is being obstructed. For a small stream like the Upper Santa Fe River at and above Worthington Springs water levels may provide a better choice than flow for setting MFLs. Level data is also easier to collected so more sampling points on a stream could be developed.</p>	
46	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>Determining the Status of MFLs</p> <p>FAC 40B-8.061 is vague because it fails to define how you determine if the established MFL is being met. The set MFLs are based on a historic flow duration curve for a period of record. It is not clear from the Technical Document for the Upper Santa Fe River MFL what the dates were for the period of record. The end dates appear to have been between 2000 and 2004. To determine current conditions a flow duration curve needs to be developed. FAC 40B-8.061 fails to establish what the time period for the evaluation flow duration should be. There are several possibilities:</p> <ol style="list-style-type: none"> 1. Flow data could be added to the flow duration curve in the rule. 2. A flow duration curve could be created with data collected after the end of the period of record in FAC 40B-8.061 flow duration curve. 	<p>The Upper Santa Fe River was evaluated as part of the water resource assessment. Details on the methodology used can be found in Appendix F.</p>

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			<p>3. A flow duration curve could be created for a set time period such as 10 years with new data added and data older than 10 years deleted.</p> <p>FAC 40B-8.061 makes no reference to Pumps Off, Current Pumping, the NFSEG Model, and Reference Criteria used in Appendix F Table F1 to determine if MFLs are and will be met.</p> <p>The BSWCD contends the information presented in the Draft 2023 NFRWSP fails to support the claim the Draft 2023 NFRWSP makes in Table 3 on page 57 that the MFLs for the Upper Santa Fe River are being met.</p>	
47	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	If the Final 2023 NFRWSP indicates the MFLs for the Upper Santa Fe River are being met and will be met in 2045 the WRCA of the NRWSP needs to be revised to remove Bradford and Union Counties from the WRCA that became effective December 4, 2019.	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. The Water Resource Caution Area designation was made because there are other water resource constraints in the NFRWSP area. The source of water for Bradford and Union counties is the Floridan aquifer, and the impact of those groundwater withdrawals influence the waterbodies that are constrained.
48	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>The MFLs for Lakes Sampson, Crosby, and Rowell have not been established</p> <p>Water flows from Lakes Crosby and Rowell through dug canals into Lake Sampson and</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 due to withdrawals, per statute.

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			<p>then out of Lake Sampson via a dug canal to the Sampson River that flows into the Upper Santa Fe River downstream of the Graham gauge and up stream of the Worthington Springs gauge. Flows from the three lakes make up a significant part of the 20% flow at Worthington Springs that comes from the Sampson River. The drainage basin for the three lakes and the Sampson River is almost 43,000 acres. Not evaluating the role of the three lakes in the Draft 2023 NFRWSP would raise serious questions about the methodology used in the Draft 2023 NFRWSP when much smaller lakes with much smaller drainage basins are included in the Draft 2023 NFRWSP.</p> <p>Establishing the minimum level for Lakes Sampson, Crosby, and Rowell is a critical step in the water assessment process and reducing the flooding of homes around Lakes Sampson and Crosby.</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>
49	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>The methods used in the NFRWSP to determine the impacts of mining.</p> <p>How is gpcd related to the CII/MD category?</p> <p>How was Commercial/Industrial/Institutional and Mining/Dewatering historic water use determined?</p> <p>Mining operations use water not related to mine dewatering. The Draft 2023 NFRWSP should refer to all water used for mining.</p>	<p>The CII category consists of commercial, industrial, and institutional use, which can be influenced by increases in population. The relationship between gpcd and the CII/MD category is that there is an expected proportional increase with the growth of population and the demand for water, both in its consumption for the manufacturing of commercial and industrial products and in its utilization for institutional purposes.</p>

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			<p>Mine dewatering also can include the removal of groundwater from the surficial aquifer. Mining also is done in the Floridan Aquifer resulting in evaporation losses from both the exposed water surface and the wet mined materials.</p>	<p>CII/MD historic water use is reported to the District based on the monitoring requirement outlined in the permit.</p> <p>Appendix B on page 3: "The MD category consists of water use associated with mining (extraction and processing of subsurface materials and minerals) and long-term dewatering (removal of water to control surface or groundwater levels during construction or excavation activities)."</p> <p>Appendix B on page 10: "For this NFRWSP, surface water use by mining operations represents 5% of total surface water use, to account for the loss of water in mining products and evaporation. The remaining surface water was assumed to be recirculated in the mining process and, therefore, is considered non consumptive."</p>
50	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	Table B-9 does not appear to be included in Appendix B.	Table B-9 is included in Appendix B and is on page B-9.
51	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>Who is included in the 1-in-10 year Drought Subcommittee of the WPCG?</p> <p>What data was used to determine that drought would not impact mining water losses?</p>	<p>The Drought Subcommittee consisted of staff from all five water management districts as well as DEP. A list of the staff members can be found in the Final Report, which is listed in the references section in Appendix B.</p> <p>Appendix B on page 10: "The 1-in-10 year Drought Subcommittee of the WPCG, as</p>

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				<p>stated in their final report, determined that drought events do not have significant effects on water use in the CII/MD category. Water use for the CII category is related primarily to processing and production needs and therefore, the average water demands, and 1-in-10 water demands are assumed to be equal. Water use for the MD category is also not expected to increase during drought conditions." Additionally, commercial/industrial products are typically market driven, not climate or weather driven, depending on the product.</p>
52	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>Figure 3 of Appendix M: Lakes Brooklyn and Geneva Recovery Strategy indicates that Mining Dewatering accounts for 7% of the change in Upper Floridan Aquifer levels.</p> <p>How much of the 7% comes from the pre 2023 DuPont/Chemours mining operations?</p> <p>What are the expected changes from the Chemours Trail Ridge South mining operation which began in Clay County near Blue Pond in October 2022. If dewatering was required for the mined area, the removed water would likely have been discharged into the Upper Santa Fe Basin.</p> <p>The issue of evaluating mine dewatering needs to be addressed in the Water Assessment because the dewatering and mined area stormwater management moves</p>	<p>The 2023 NFRWSP is a regional planning effort and does not address the specific assessments used in support of the Lakes Brooklyn and Geneva Recovery Strategy that was approved by the SJRWMD Governing Board in 2021.</p> <p>The Districts acknowledge this is a planning level effort and refer to the Districts' robust environmental resource and consumptive/water use permitting programs to address the potential for harm when redirecting surface water from one location to another. The surface water used for heavy mineral sands mining is largely recirculatory in nature and the amount of water that is consumptively used is very small. In addition, new dry mine technologies, which keep water used in the mining process within the mining footprint are closed-loop systems and are not considered a consumptive use. Therefore,</p>

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			<p>water between water management districts and water basins.</p> <p>Requiring consumptive use permits for all mine dewatering and processing operations should be required so the impact of mining on surface water flows and aquifer levels can be assessed.</p>	<p>new mining operations that employ dry mine technology are not required to obtain a consumptive use permit.</p>
53	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>The period 2020 to2045 would be 25 years. The BSWCD suggests changing the words “20-year planning period through 2045” be changed to 25-year planning period through 2045.</p>	<p>The projections made for the NFRWSP were developed using the best available information at the time developed. Planning projections are updated at least once every five years to take into account improved data and methodologies.</p> <p>Section 373.709 (2) F.S. states that a RWSP must be based on at least a 20-year planning period.</p>
54	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p><i>While there are increases in surface water demand projected, the Districts determined that there are sufficient water sources to meet the projected demand.</i></p> <p>BSWCD Comment What data supports this claim?</p>	<p>The majority of increases in surface water demand occur in the Landscape / Recreational Self-Supply category which typically utilizes on-site ponds to meet irrigation demand.</p> <p>Clarification to support this claim has been added. See chapter 6, page 72.</p>
55	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p><i>Figure 3. Watersheds (8-digit hydrologic unit code) in the NFRWSP region (USGS, 2023)</i></p> <p>BSWCD Comment</p> <p>We suggest adding the 8-digit hydrologic unit code to the legend.</p>	<p>Figure 3 has been updated.</p>

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56	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>Draft 2023 NFRWSP Page 20 &21</p> <p><i>Groundwater Resources: Groundwater resources in the NFRWSP area include the Surficial aquifer system (SAS), the Floridan aquifer system (FAS)and, where present, the intermediate confining unitintermediate aquifer system (IAS). A brief description of these aquifer systems is listed below:</i></p> <ul style="list-style-type: none"> • Surficial Aquifer System (SAS): <i>The SAS is the uppermost aquifer system, generally unconfined, and comprised primarily of unconsolidated beds of sand, shelly sand, shell, and clay.</i> • Intermediate Confining Unit (ICU)/Intermediate Aquifer System (IAS): <i>The ICU/IAS is in the intermediate confining unit which separates the underlying Floridan aquifer system FAS from the overlying SAS throughout a large portion of the planning region. In some areas, the Floridan aquifer system FAS is unconfined due to the absence of the ICU, such as in the lower Suwannee River basin in the SRWMD. In other areas within the planning region, the ICU is quite thick. In Duval and Nassau counties, the ICU is hundreds of feet thick.</i> 	Updates have been incorporated in Chapter 1.
57	Paul Still; Bradford Soil and Water	10/4/2023 via email	<i>Floridan Aquifer System (FAS): The FAS within the planning area is comprised primarily of carbonate rocks. In much of its extent, the</i>	Updates have been made to Chapter 1 on page 21 to reference the NFSEG v1.1 Final Report.

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	Conservation District		<p><i>FAS is comprised of an upper aquifer, the Upper Floridan aquifer (UFA) and lower aquifer, the Lower Floridan aquifer (LFA). The two aquifers are separated by a semi-confining unit referred to as the middle confining unit (MCU). Regionally, the MCU varies in lithologic and hydraulic characteristics and the degree of confinement of the MCU can vary significantly. In Northeast Florida, the LFA is further subdivided into an upper zone, referred to as the upper zone of the Lower Floridan aquifer and a lower zone, the Fernandina permeable zone. The upper zone of the Lower Floridan aquifer is separated from the Fernandina permeable zone by the lower semi-confining unit.</i></p> <p>The above language fails to acknowledge that for parts of the Draft 2023 NFRWSP area there is no MCU. Without a MCU you cannot have a UFA and a LFA.</p> <p>The BSWCD suggests referencing the information copied below from page 3-17 of the NFSEGV1.1 Final Report page 3-17.</p> <p>“Layer 3 Layer 3 is used primarily to represent the Upper Floridan aquifer. Where the Upper Floridan aquifer is not present as a separate hydrogeologic unit (i.e., where the middle confining unit is effectively absent), Layer 3 represents a shallower section of the Floridan aquifer system (Zone 1 of the present study, as noted in Table 2.2).”</p>	

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			The BSWCD suggests adding Figure 2-13 from the NFSEGV1.1 Final Report to demonstrate where the MCU does not exist.	
58	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p><i>Traditional Water Sources:</i></p> <p><i>Current water sources in the NFRWSP area include groundwater (fresh and brackish), reclaimed water, surface water, and stormwater. The majority of water use in 2015 in the NFRWSP area was fresh groundwater (Appendix B, Table B-2). Given this consistent pattern of historical and current utilization of fresh groundwater, the Districts recognize fresh groundwater as the only traditional water supply source in the NFRWSP area and designate all other water sources to be nontraditional (i.e., alternative water supply; (subsection 373.019(1), F.S.).</i></p> <p>While fresh groundwater may be the source of majority of water use in the 2015 in the Draft 2023 NFRWSP it is important to acknowledge where other sources of water are used. In Bradford County surface water is used by heavy mineral sands mining operations. The actual use of surface water in heavy mineral sands mining operations in Bradford, Clay, and Baker Counties appears to have been discounted possibly because mine operators have not been required to obtain consumptive use permits for their use of surface water.</p>	<p>As noted earlier, the surface water used for heavy mineral sands mining is largely recirculatory in nature and the amount of water that is consumptively used is very small. In addition, new dry mine technologies, which keep water used in the mining process within the mining footprint are closed-loop systems and are not considered a consumptive use. Therefore, new mining operations that employ dry mine technology are not required to obtain a consumptive use permit.</p>

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59	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p><i>In addition, beginning in February 2023, District staff held many focused stakeholder meetings with local governments, regional organizations, agricultural entities, and other stakeholders in the NFRWSP area. The purpose of these meetings was to share an overview of the NFRWSP process, provide background information of interest to stakeholders, and answer questions.</i></p> <p>BSWCD Comment</p> <p>Please provide information (when, where, participants) about who was included in the “many stakeholder meetings”. How were the participants in the meetings selected?</p>	<p>Updates were made in Chapter 2 to provide more details on the noticed workshops and stakeholder comment period.</p> <p>In addition to these noticed meetings, various methods and forums were used to notify and solicit input from stakeholders.</p>
60	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p><i>Purpose The Districts develop water demand projections to determine existing legal uses, anticipated future needs, and existing and reasonably anticipated sources of water and water conservation efforts.</i></p> <p>It would be helpful to identify what data presented is actual use data and what data is estimated use. It would also be helpful to show data from 2015 to the most current year with actual use data in a table and in the graphs included on pages 26 to 39.</p>	<p>At the time the data for the NFRWSP was developed, the most current year of water use data had not yet been reported, therefore the data in the tables in Appendix B were the best available data at that time.</p>
61	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p><i>For this NFRWSP, two percent of total surface water use by PG facilities is considered consumptive, to account for water loss due to evaporation.</i></p>	<p>See page 10 in Appendix B: “surface water use by mining operations represents 5% of total surface water use, to account for the loss of water in mining products and evaporation.”</p>

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			<p>BSWCD Comment</p> <p>Why is the loss 2% for power generation when it was 5% for mining?</p>	<p>Power generation water use does not have product associated with it.</p> <p>See page 11 of Appendix B: "Surface water use by PG facilities represents 2% of total surface water withdrawals to account for the loss of water due to evaporation."</p>
62	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>Draft 2023 NFRWSP Page 44</p> <p><i>Figure 17. Changes in UFA water levels from CP to 2045 within the NFRWSP area</i></p> <p>BSWCD Comment</p> <p>A Figure showing the area where the middle confining unit is known to occur should be added.</p> <p>Is there an UFA if there is no middle confining unit?</p>	<p>Information regarding the MCU, along with a figure, can be found in Chapter 2 of the NFSEG v1.1 Final Report.</p>
63	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>Draft 2023 NFRWSP Page 64</p> <p>Resiliency</p> <p><i>Rising sea levels and changing climate pose a threat to natural and manmade systems, including infrastructure that supports access to fresh water. Florida is vulnerable to the effects of climate change and SLR due to its unique climate, hydrology, geology, topography, natural resources, and dense coastal populations. To better plan for the potential effects of these future changes, the</i></p>	<p>Section 373.709 (2) F.S. states that a RWSP must be based on at least a 20-year planning period.</p> <p>The Districts do recognize that climate change poses uncertainty in water supply availability, and that local management actions and regional collaborations will help mitigate the associated impacts and enhance the continued reliability of water supply in the NFRWSP planning area. To plan and prepare for climate change, the Districts conducted a planning level assessment to determine if</p>

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			<p><i>Districts conducted a planning level assessment to determine if fresh water supplies in the NFRWSP region are likely to become constrained due to flooding from SLR throughout the 20-year planning horizon (Appendix I).</i></p> <p>Appendix I Resiliency Assessment Page 2</p> <p><i>Purpose The Districts conducted a planning level assessment to determine if fresh water supplies in the NFRWSP area are constrained or likely to become constrained due to flooding from sea level rise (SLR) throughout the 20-year planning horizon.</i></p> <p>The planning horizon is 25 years.</p> <p>Shane Williams from the Alachua County Environmental Protection Department made a presentation at the September 28, 2023, Santa Fe River Springs Protection Forum titled Alachua County Vulnerability Analysis. That analysis is near completion and some parts are complete.</p> <p>The information presented in the presentation clearly demonstrated that a resiliency assessment should go beyond sea level rise.</p> <p>The BSWCD contends that the impacts of climate change noted in the Alachua County analysis should be included in the NFRWSP that covers a period to 2045. The impacts are so significant the approval of the 2023</p>	<p>fresh water supplies in the NFRWSP region are likely to become constrained due to flooding from Sea Level Rise throughout the 20-year planning horizon consistent with the DEP “Format and Guidelines for Regional Water Supply Planning” (a statement referencing these guidelines has been added to the plan). Individual entities, such as Alachua County, are conducting more detailed vulnerability assessments of their facilities that consider compound flooding and other relevant factors. Additional text was added to Chapter 5 of the plan to highlight the detailed analyses being conducted by local entities through their vulnerability assessment of critical infrastructure.</p>

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			NFRWSP should be delayed until climate change impacts can be included in the 2023 NFRWSP even if it the plans has to become the 2024 NFRWSP.	
64	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	The 2007 Upper Santa Fe Technical Document stated that that 0% water was available at both the Graham and Worthington gauges at the 75%, 90%, and 95% exceedance amounts. One would have to assume that no additional withdrawals have occurred after the end of the period of record used to create the Flow Duration Curve for the 2007 technical report. It is unclear what the end date was for the two river gauges but it appears it was between 2000 and 2004.	Supplemental Comment Received Your comment has been acknowledged.
65	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	The Upper Santa Fe MFL was established in FAC 40B-8.061. There is no reference in FAC 40B-8.061 to the NFSEG model or Reference Criterion used to demonstrate the Upper Santa Fe MFLs are being met. FAC 40B-8.061 is based on the Flow Duration Curves for the two gauges.	Supplemental Comment Received The Upper Santa Fe River was evaluated as part of the water resource assessment. Details on the methodology used can be found in Appendix F.
66	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>The MFLs were not changed. The change is in the determination 2010 assessment that the low flow frequencies at Worthington Springs would not met in the future to the determination in the 2017 plan and the Draft 2023 NFRWSP that low flow levels would be met in the future.</p> <p>Flows from the three lakes make up a significant part of the 20% flow at Worthington Springs that comes from the Sampson River.</p>	<p>Supplemental Comment Received</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>

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			<p>The drainage basin for the three lakes and the Sampson River is almost 43,000 acres. This should establish the importance of the three lakes.</p> <p>The additional flow and level data from 2000 to the present and the development of the NFSEG model would appear to meet the stated criteria for the reevaluation of Upper Santa Fe MFL.</p>	
67	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	Establishing the minimum level for Lakes Sampson, Crosby, and Rowell is a critical step in the water assessment process and reducing the flooding of homes around Lakes Sampson and Crosby. Effective planning for use of existing flood control structures requires these MFLs to be established.	<p>Supplemental Comment Received</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 due to withdrawals, per statute.</p>
68	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>What is the meaning of “calibrated hydrologic conditions” in this statement?</p> <p>How do the observed levels for all the aquifers in 2018 compare to the model predictions for 2018?</p> <p>Have the model results been compared to any actual data for any year after 2018?</p> <p>What data was used to update the CP and 2045 data for the Georgia part of the model?</p> <p>What would the figures look like if you run the comparisons with the Georgia data in the pumps off mode?</p>	<p>The “calibrated hydrologic conditions” refers to pumps off conditions as simulated by the 2009 version of the NFSEG v1.1.</p> <p>The NFSEG model and well files are publicly available for the execution of these scenarios, however, these scenarios are not essential in the planning process for the water resource assessment. More information on the scenarios ran for the water resource assessment can be found in Appendix F and G.</p> <p>Appendix B on page 18 discusses the updated Georgia water use data and projections.</p>

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			<p>What would the figures look like if you run the comparisons with the Georgia and SJRWMD in the pumps off mode?</p> <p>Can the model be run with individual counties in the Pumps Off mode?</p>	
69	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p><i>Water use estimates used as inputs to the NFSEG were updated from the 2017 NFRWSP and vetted through a thorough public review process.</i></p> <p>What date was the water use estimates updated to?</p> <p>When was the public review process done and how was it done?</p>	<p>Water use data and updates are detailed in Chapter 3 and Appendix B.</p> <p>Clarification has been provided in Chapter 2.</p>
70	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>Appendix C Page 6 and 7 Figures C 3 and C 4</p> <p>What information was used to establish that there is a middle confining unit in the Floridan Aquifer in Bradford County west of SR 100?</p> <p>There are no figures for “no pumps off to 2045” for the Hsurficial and Lower Floridan aquifers?</p> <p>And the intermediate aquifers.</p>	<p>Chapter 2 of the NFSEG Final Report discusses the middle confining unit. (Durden et al., 2019)</p> <p>The figures referenced are not essential in the planning process, which assessed changes from current pumping to 2045. More detailed information regarding the figures can be found in Appendix C.</p>
71	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p><i>Figure 2. A portion of the District showing the updated integrated soils and vegetation layer. Three indicates high potential for adverse change to wetlands, two for moderate potential, and one for low potential.</i></p>	<p>“Attachment A – 2022 Kinser-Minno Wetland Assessment Tool 20221209” is a separate technical report describing recent improvements made within the geoprocessing tool last updated by the SJRWMD in 2008.</p>

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			<p>Figure 2 of Attachment 2 does not show the NFRWSP area. The Draft 2023 NFRWSP should have a Figure with the information in Figure 2 for the NFRWSP area.</p> <p>The results from the Attachment A 2022 Kinser-Minno Wetland Assessment Tool 12/9/22 Update appear to significantly reduce the area and locations of impacted wetlands identified in the draft 2023 NFRWSP when compared to the 2015-2035 NFRWSP. The information in the draft 2023 NFRWSP needs to be checked and if the information is correct an explanation of why the reduction occurred.</p>	<p>Since the Kinser-Minno GIS method is used to estimate the future potential for adverse change to wetlands throughout the District, Figure 2 of the technical report is included to provide an example of the updated integrated soils and vegetation layer. A separate figure of this layer for the North Florida region was not provided in the 2023 NFRWSP as this is an interim product generated as part of the geoprocessing workflow within the ModelBuilder tool.</p> <p>The wetland assessment performed in support of the 2015-2035 NFRWSP used the 2008 Kinser-Minno method. The wetland assessment performed in support of the 2023 NFRWSP used the 2022 Kinser-Minno method. The 2022 Kinser-Minno method includes updates to the soils data, vegetation layer, and the Digital Elevation Model (DEM) data. Another screening parameter, depth to water table or Surficial aquifer system (SAS), was also introduced for the areas where the UFA is confined. This additional step of incorporating the depth to water table in the areas of confined UFA provides further screening to ensure the area is hydraulically connected to the SAS and therefore, would or would not be influenced by changes in SAS levels. A combination of the 2022 updates made to Kinser-Minno method, use of an updated groundwater flow model and updated groundwater demand and projections, all of which are based on best available information, resulted in the reduction in wetland acreage</p>

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				with a moderate to high potential for change as noted from the previous plan. As noted in Chapter 5 of the plan, changes to wetlands from groundwater pumping are primarily addressed via the Districts' regulatory programs and through the development of WSD and WRD projects.
72	Paul Still; Bradford Soil and Water Conservation District	10/4/2023 via email	<p>Reevaluation of the NFRWSP Process</p> <p>The BSWCD would like to suggest that the NFRWSP process may not be the best and most efficient way to address our areas future water needs. The area covered by the plan is too large and the geology, hydrogeology, and water use of the area covered too different.</p> <p>The NFRWSP was initiated in part because of SRWMD concern that SJRWMD withdrawals were impacting groundwater levels in the SRWMD. Does the current model generated data support that concern? If it does what parts of the SJRWMD responsible for most of the impacts? Having the NFRWSP focused on the primary impact areas of the SJRWMD would make the process more productive and efficient.</p>	<p>Section 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>The formation of the Partnership was a response to the recognition that groundwater withdrawals in both SRWMD and SJRWMD have impacts on the natural systems, thereby necessitating a collaborative approach to address these impacts.</p>
73	Jeremy D. Johnston; Clay County Utility Authority, on behalf of The North Florida	10/6/2023 via email	Please accept these comments on behalf of the North Florida Utilities Coordinating Group (NFUCG) and its members, 1 regarding the draft 2023 North Florida Regional Water Supply Plan (the Plan). NFUCG and its members have been active participants and	The Districts appreciate the feedback and participation of the North Florida Utility Coordination Group in the North Florida planning process.

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	Utility Coordinating Group		<p>contributors throughout the Water Management Districts' Plan development process. We appreciate the opportunity to collaborate with District staff and stakeholders regarding this important aspect of achieving shared goals of protecting our water resources and assuring that sufficient water supplies exist to meet our region's water needs. NFUCG supports the joint approval of the Plan by the Suwannee and St. Johns River Water Management Districts.</p> <p>Significant Achievements in Conservation and Reuse</p> <p>NFUCG and its members would like to take this opportunity to commend both Districts for their commitment to encouraging the sustainability of our region's water resources. As the draft Plan recognizes, two critical components of this sustainability are continued commitment to conservation and the use of reclaimed water. The Plan correctly recognizes that public water suppliers expect to achieve even greater water conservation and greater reuse of reclaimed water over the 20-year planning period. However, we recommend the Plan recognize the significant achievements that the Districts, public water suppliers and other users have already realized in both conservation and reclaimed water use.</p> <p>As reflected in the figure below, since 2006, the population served by NFUCG members</p>	<p>Additional language has been included in Chapter 7 to recognize the work of the NFUCG in the region.</p> <p>The Districts and DEP look forward to continued collaboration with NFUCG in the future as work on LSFIR strategies progresses.</p>

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			<p>has increased by almost 200,000 people, from approximately 1.09 to 1.26 million. However, during the same time period, actual water use by NFUCG members declined from 192 million gallons per day (mgd) to 173 mgd. This water savings can be directly linked to water conservation and water reuse efforts undertaken by NFUCG members, our customers, and the Districts. If not for these efforts, water use would have risen during this period up to approximately 223 mgd, which is 50 mgd greater than the actual demand of 173 mgd. We consider this an important point for the Plan to recognize these past successes, such as the NFUCG's 50 mgd reduction in water use, since the ongoing emphasis and investment in conservation significantly reduced the amounts of water necessary to meet future demand.</p> <p>Similarly, NFUCG members, frequently in coordination with the Districts' cost-share programs, made significant investments in the increased use of reclaimed water. Since 2000, NFUCG members invested over \$150 million on beneficial reclaimed water projects, resulting in over a 100% increase in both reclaimed water use and reclaimed water capacity. This commitment to the reuse of reclaimed water provided significant benefits to the region, by allowing public suppliers and other users to reduce or eliminate the use of potable water for irrigation purposes providing direct environmental benefits. As</p>	

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			<p>reflected in the draft Plan, NFUCG members remain committed to even greater expansion of all feasible reclaimed water use in the future, however we believe the Plan should also recognize the significant achievements that have already been realized by the Districts, public suppliers, and other water users.</p> <p>Financial Commitment to Implement Regional Water Resources Projects</p> <p>In addition to the commitment and investment in conservation and water reuse, we appreciate the opportunity to participate in Regional Water Resource Development Projects which increase the sustainability of our water supply while addressing potential impacts. We hold the Black Creek Water Resources Development Project as one such project which will provide benefits across the NFRWSP area. In the previous 2015-2035 NFRWSP adopted in 2017, the Black Creek Project was identified as a potential project option with a timeframe for completion of 2035. However due to cooperation between SJRWMD and stakeholders like NFUCG's members, the Black Creek Project is nearing completion and slated to provide significant benefits to the region in the near future. As noted in the draft Plan, four NFUCG member utilities entered into agreements to fund the construction and operation of this project as a way to address their proportionate share of impacts to several water bodies. NFUCG</p>	

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			<p>members committed to contribute a combined total of approximately \$19.2 million toward the Project.</p> <p>The NFUCG looks forward to continuing to collaborate as additional Regional Water Resource Development Projects are identified to address potential impacts to other water bodies. These types of projects can be an equitable way to address regional water resources while allowing all users to address their proportionate share of impacts.</p> <p>Public Suppliers' Participation in the Process</p> <p>Finally, we appreciate the opportunities the Districts' have provided to us and other stakeholders to participate in the Plan development process. We consider this participation important in allowing the public to stay informed regarding the Districts' planning initiatives and allowing stakeholders to contribute their own resources and technical expertise supporting the Districts' efforts.</p> <p>In the case of the draft Plan, in addition to being active participants in the Plan review and development process, NFUCG members identified 86.6 mgd of the 87.9 mgd (99%) of alternative water supply project options included in the Plan, at a total estimated cost of over \$800 million. In addition, when factoring in water resources development and water conservation project</p>	

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			<p>options, NFUCG members identified 122 mgd of the 158 mgd (77%) of all project options included in the Plan, at a total estimated cost of over \$ 1.8 billion. In other words, the contributions of NFUCG and its members are essential to the development of a successful Plan, and will remain central to the successful implementation of the objectives identified in the Plan.</p> <p>Given the critical role NFUCG and its members will continue play in working with the Districts and other stakeholders in achieving these goals, we look forward to continuing to closely coordinate with the Districts regarding future planning, modeling, and regulatory efforts. In particular, we look forward to working with District staff regarding the further development of the minimum flow and level prevention and recovery plan for the Lower Santa Fe and Ichetucknee Rivers to ensure the sustainability of water supply while meeting the needs of these water bodies. We also look forward to working with District staff in the setting and evaluation of minimum flows and levels for the Suwannee River. Each of these endeavors serve key aspects of ensuring protection of the region's water resources and while providing reliable and affordable sources of water for our region's needs.</p> <p>Thank you for your consideration of these comments and we look forward to continuing to work with the Districts on these important issues.</p>	

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74	Chris Farrell; Audubon Florida – Northeast Florida Program	10/5/2023 via email	<p>Audubon Florida appreciates the opportunity to comment on the draft North Florida Regional Water Supply Plan. Strong leadership by the two water management districts involved is imperative to ensure adequate protection of our natural resources as demands for water increase.</p> <p>North Florida has challenges ahead as its population is projected to increase by almost 50% by 2045, accompanied by a 32% increase in water demands. Water supply plans – and the resulting discussions and local planning efforts – will have profound implications on the future economy and quality of life of the region. Below are several suggestions that will help decision-makers and the public identify strategies that are most likely to produce cost-effective, sustainable solutions that will produce more resilient communities.</p> <p>Reduced Outdoor Irrigation Can Eliminate Much of Future Water Demand with Added Benefits</p> <p>Outdoor irrigation is arguably the most important single issue that should be addressed to alleviate the increase in demand for groundwater moving forward. H2OSAV data show that single-family residences in Florida routinely use 50% or more of their water on outdoor irrigation. Much of this water is high-quality groundwater that is treated and intended for human consumption. Additionally,</p>	<p>The Districts recognize the importance of water conservation and promote best management practices through our planning, cost-share, education and outreach, and regulatory programs. The Districts maintain extensive conservation programs that have resulted in significant water savings within all water use categories. Chapter 7 of the 2023 NFRWSP highlights outdoor residential water use (irrigation) as a prime target for demand reduction.</p> <p>The 2023 NFRWSP is a regional planning level effort and does not define specific project benefits, such as 50% reduction in irrigation for new homes. However, these types of regional benefit analyses are conducted in the development of prevention/recovery strategies. While the Districts agree that additional benefits, such as reduced energy and water pollution, can be gained with the efficient use of outdoor irrigation, water supply plans are developed to identify sustainable water supplies for all existing and anticipated water uses while protecting water resources and related natural systems.</p>

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			<p>changes that reduce outdoor irrigation (mainly reduced use of turfgrass) provide numerous benefits that help address additional challenges that are negatively impacting Floridians.</p> <p>We appreciate the discussion of the Turf Swap Program in Alachua County and encourage the districts to vigorously pursue similar programs throughout North Florida. There are many high-quality, existing resources to help homeowners transition to more sustainable yards including Audubon’s Plants for Birds program (https://www.audubon.org/plantsforbirds) which connects homeowners to local resources to ensure their success. Additionally, the plan would provide additional insight to local governments if it included an analysis of the benefits associated with limits on outdoor irrigation (e.g., what if demands for irrigation were reduced by 50% in all new development). Such a discussion should consider all benefits including reduced energy use, water pollution, and more.</p>	
75	Chris Farrell; Audubon Florida – Northeast Florida Program	10/5/2023 via email	In addition, the plan highlights provisions for “watering efficiently” and the landscape irrigation restrictions of 40C-2, F.A.C. However, these measures only curtail wasteful, excessive use of water by allowing users to put tens of thousands of gallons of water on turfgrass each month. The plan should explain that following these guidelines only serves to avoid harmful levels of	The Districts agree that water conservation is a priority because it contributes to the sustainability of water supply sources. Conservation strategies and projects are recognized as typically being the most economically feasible and are likely be a more cost-effective option than implementing water supply development and water resource development projects. The Districts continue

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			<p>overwatering and should be considered a minimum level of restriction rather than a true conservation measure. The plan should take more time to explore landscape approaches that meaningfully reduce the water demand.</p>	<p>to work with water users and multiple agencies throughout the state to identify innovative strategies to further reduce water demand. Additional strategies to reduce demand have been added to the Chapter 7 discussion on water conservation.</p>
76	Chris Farrell; Audubon Florida – Northeast Florida Program	10/5/2023 via email	<p>Also discussed in the plan are tiered rate structures for water users. Audubon supports this measure and suggests that the plan discuss the ramifications of tiered rate structures including the number of users that switch to their own private irrigation wells. Local governments need to be aware that public use numbers may decline with higher rates (the intended goal), but many users may be switching to water sources that are not currently tracked sufficiently to understand their impact. The plan could suggest the type of reporting or permitting that would enable Florida governments to better evaluate the impact of thousands of private wells being drilled to various depths across the district.</p>	<p>The 2023 NFRWSP is a regional planning level effort and not a regulatory approach to define specific management strategies. The installation and use of water from landscape irrigation wells are regulated in accordance with 40C-3 and 40C-2.042, F.A.C., which limits the water use for landscape irrigation “to only that necessary for efficient utilization.” The landscape irrigation rules in 40C-2.042 F.A.C. are applicable whether that water is supplied by a utility or an individual irrigation well. Additional regulatory measures associated with an MFL recovery would be included in the Recovery Strategy.</p> <p>The Districts have an active contract with the University of Florida to analyze usage patterns where irrigation wells are known, estimate the number of wells and quantity of water for areas with and without irrigation wells, and provide recommendations on how the data can be extrapolated to other areas. 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.</p>

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77	Chris Farrell; Audubon Florida – Northeast Florida Program	10/5/2023 via email	<p>Water Reuse is an Important Tool in the Toolbox, but it Must be Used Correctly</p> <p>Groundwater is already pumped beyond sustainable levels in many areas of the state. The plan states that many water bodies are already in recovery and that additional wetlands, lakes, and rivers could be harmed further by additional pumping. Wastewater reuse should prioritize methods with the most benefit and least potential for unintended harm. Audubon Florida recommends a focus on projects that involve groundwater recharge of water that meets advanced wastewater treatment standards. Rather than focusing on reuse for outdoor irrigation which is energetically demanding and a potential non-point source of pollution, we encourage the Districts to consider other projects. For example, many recharge projects have used treatment wetlands to cost-effectively achieve impressive nutrient reductions while providing wildlife habitat, recreation, and tourism benefits.</p>	<p>The Districts support groundwater recharge projects that meet all permitting criteria. The 2023 NFRWSP identifies a suite of water supply and water resource development project options from which utilities can select projects to help meet our future water demands. Included in this suite of projects are multiple groundwater recharge projects using reclaimed water treated to appropriate standards. See the Water Resource Development table (Table K-2) in Appendix K Project Options. Many of these groundwater recharge projects using treated reclaimed water are treatment wetlands. See Project numbers 2023_20 and 59 GRU Groundwater Recharge Wetlands; Project No. 59 City of High Springs Infiltrative Wetlands; and Project No. 2675 Lake City Recharge Wetland for some examples.</p>
78	Chris Farrell; Audubon Florida – Northeast Florida Program	10/5/2023 via email	<p>The Large Scope of our Water Challenges Requires a New Approach</p> <p>We ask that the plan include a more robust discussion of various approaches to meeting water supply needs. A more holistic analysis of our water problems and solutions will assist local governments as they update their comprehensive plans in response to the water supply plan findings. Specifically, it would be</p>	<p>Using the authority given to the Districts, a holistic approach is employed to meet water supply needs in the North Florida region which includes water supply planning, regulatory programs, MFLs development, recovery and prevention strategies, and other resource protection measures. Water supply plans do not address the value of green vs grey infrastructure (impacts to habitat, energy use,</p>

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			<p>helpful to include some discussion on the different values associated with green versus grey infrastructure (impacts to habitat, energy use, greenhouse gasses, etc.), potential opportunities for harm when redirecting surface water from one location to another, and the value of reducing demand rather than continuing to allocate more water from natural systems to our built environment.</p> <p>Thank you for considering our comments. Please contact us if you have any questions.</p>	<p>greenhouse gasses, etc.) because it is not within their scope of review.</p> <p>The Districts acknowledge this is a planning level effort and refer to the Districts' robust environmental resource and consumptive/water use permitting programs to address the potential for harm when redirecting surface water from one location to another.</p> <p>The Districts recognize the value of reducing water demand and the plan identifies conservation strategies and projects as being a more cost-effective option than implementing some water supply and water resource development projects. The Districts also maintain extensive conservation programs that have resulted in significant water savings within all water use categories.</p> <p>Based on current pumping conditions, constraints on the water resources in the North Florida region dictate that future use of groundwater may be more limited. A suite of projects, including water conservation, alternative water supply and aquifer recharge projects, were developed as part of this planning process to address this deficit in groundwater availability. In addition to implementation of projects, the Districts' regulatory programs take into account these constraints when evaluating water use/consumptive use permits. The SJRWMD Water Use Regulation staff have worked with</p>

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				<p>applicants and permittees in the North Florida region who submitted Consumptive Use Permit (CUP) application to achieve a net reduction of 30.0 mgd in permitted UFA groundwater allocations since 2015. Additionally, the SRWMD staff has reduced groundwater allocations in the NFRWSP area by over 10 mgd since 2015, which is when the LRFI recovery strategy was adopted. Permits will continue to be evaluated to determine whether existing allocations can be reduced. Typically, this evaluation occurs upon application for a CUP permit renewal or permit modification, or if recovery strategies require reevaluation of the permit at an earlier date.</p>