

July 17, 2015

South Florida Water Management District
ATTN: Mr. Dean Powell
Water Supply Bureau
3301 Gun Club Road
West Palm Beach, Florida 33406

RE: Draft Central Florida Water Initiative (CFWI) Water Supply Planning Documents

Dear Mr. Powell:

The regional utility partnership informally referred to as "STOPR+2" which includes the City of St. Cloud, Tohopekaliga Water Authority, Orange County, Polk County, Reedy Creek Improvement District, Seminole County, and Orlando Utilities Commission—offers the attached editorial comments on the draft Central Florida Water Initiative (CFWI) water supply planning documents (see Attachment A). These comments are provided by STOPR+2 as a courtesy, for the water management districts' consideration, to address several minor items and prepare cleaner versions of the final documents.

Please note that the STOPR+2 Group will also provide, under separate cover, a set of comments addressing more substantive issues we have identified via a thorough review of the latest draft documents.

We appreciate the opportunity to review and provide comments on the Draft CFWI documents. We look forward to continuing to work with the Districts to implement programs that meet the water supply needs of the region.

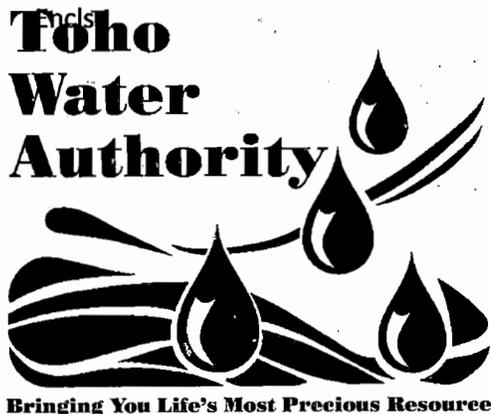
If you have any questions, please feel free to contact us.

Sincerely,



Brian L. Wheeler, P.E.
Executive Director, Tohopekaliga Water Authority
On behalf of the STOPR+2 Group

BLW/ncd



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Attachment A

Central Florida Water Initiative Draft 2035 Water Resources Protection and Water Supply Strategies Plan and Draft Regional Water Supply Plan

STOPR+2 Group Editorial Comments on May 2015 Public Drafts

Editorial Comments on Draft Solutions Plan Document (May 1, 2015 Public Draft)

- 1) Global Change: Replace the word “historic” with the word “historical.”
- 2) Preface, Page i, Second Bullet: Suggest adding “expanding water conservation” to list of strategies provided in second sentence.
- 3) Executive Summary, Page vii, Projects Section, Second Paragraph, Last Sentence: Change the text to state “The 16 WSPOs are estimated to potentially produce up to 256 mgd of finished water and potentially up to an additional 122 mgd in raw surface water.”
- 4) Executive Summary, Page x, Implementation Costs Section, First Sentence: Change “implemented” to “developed”.
- 5) Executive Summary, Page xii, Conclusions and Summary of Key Findings, Fourth Bullet on Page, First Sentence: Change text as follows: “Project costs were estimated, potential cost scenarios were identified, and strategies that address data collection needs and environmental recovery projects were developed ~~implemented~~ to provide a balanced approach for a sustainable water supply.”
- 6) Chapter 1, Page 1, First Paragraph, Third Sentence: Add “adoption of the” after “...delaying final agency action on the....”
- 7) Chapter 1, Page 1, Second Paragraph, Sixth Sentence: Change “demand deficit” to “supply deficit”.
- 8) Chapter 2, Page 19, First Full Paragraph, First Sentence: Delete the parenthesis at the end of the sentence.
- 9) Chapter 1, Page 3, First Paragraph after Bullet List: Change the text “...optimizing the use of existing groundwater”... to “evaluating projects to potentially increase the use of existing groundwater sources.” No optimization was performed as part of the CFWI process; therefore, the current text is inaccurate.
- 10) Chapter 2, Page 20, Water Conservation Project and Program Options Subsection, Last Paragraph, Last Sentence: Change the text in this sentence as follows: “Targeted education, public information, and social marketing provide opportunities for building a conservation culture, a stewardship ethic, and ~~to~~ permanently reducing individual, agricultural, industrial, and commercial water use.”

- 11) Chapter 3, Page 50, Table 10: Footnote “a” is not applicable to RWSP Projects 1 and 2.
- 12) Chapter 3, Page 66, Grove Land Reservoir and Stormwater Treatment Area, First Paragraph, Last Sentence: The benefits at the end should include more detail for increased reader understanding. Add “...of the St. Johns River” after surface water augmentation, indicate which aquifer is being recharged (most readers from central Florida will think UFA recharge—however, recharge to the UFA is minimal in the area of this project), and indicate what surface water systems will receive a nutrient reduction benefit.
- 13) Chapter 3, Page 71, Table 14: RWSP Project 145 includes note “b”; however, there is no note “b” for Table 14. Suggest correcting as applicable.
- 14) Chapter 4, Page 79, Figure 6: Lakes Apopka (and associated chain), Searcy, Hodge, and East Crystal were not used in CFWI analysis and should be removed from Figure 6. This also applies to Figure F-1 in Appendix F.
- 15) Chapter 4, Page 80, First Paragraph, Second to Last Sentence: Suggest changing sentence to say, “The remaining freeboard represents the approximate amount of allowable change in UFA potentiometric surface, springflow, or groundwater flow ~~associated with remaining~~ once a specific withdrawal condition or WSPO is considered.”
- 16) Chapter 4, Page 81, Last Paragraph: There may be 46 adopted MFLs within CFWI, but according to Table F-9 only 31 were used as constraints. Please add text or modify the current text to clarify this issue.
- 17) Chapter 4, Page 81, Second to Last Sentence: Add a period to the end of the sentence.
- 18) Chapter 4, Page 85, Last Paragraph: Throughout the report, it is indicated that the RWSP identified 142 WSPOs, and that 8 additional WSPOs were added during the Solutions Planning Phase for a total of 150 WSPOs. This paragraph notes the 142 WSPOs identified during the RWSP, but does not mention the 8 WSPOs identified as part of the Solutions Planning Phase. In addition, the disaggregated list (surface water, reclaimed water, etc.) included in this paragraph adds up to 151 WSPOs. Suggest correcting this paragraph as appropriate.
- 19) Chapter 4, Page 87, Environmental Evaluation Process Subsection, Paragraph between Bullet Lists: Modify this paragraph as follows, “Based on these measuring sticks, a variety of methods and assumptions were used to determine the magnitude of hydrologic change predicted by the ECFT groundwater model that could occur without.”
- 20) Chapter 4, Page 88, Non-MFL Water Bodies Subsection, Second Sentence: Change this sentence as follows, “It is not possible to assess the condition of every wetland, partly because of time and budget constraints and partly because many of them are located in remote locations and/or on private property where access is difficult or cannot be obtained, but such assessment will be essential for data gathering in future CFWI phases.”
- 21) Chapter 4, Page 90, Second Paragraph, Third and Fourth Sentence: This sentence indicates five additional constraints were not met. However, Table F-9 appears to indicate the four additional constraints were not met. Please confirm the correct number. In addition, we suggest noting if the water level changes shown are changes in SAS or UFA water levels. In summary, we suggest these sentences be updated as follows, “Figures 10 and 11 show the Baseline Condition status of MFL

and non-MFL water bodies evaluated as part of the CFWI process, and the simulated change in UFA potentiometric surface elevation at these water bodies compared to Reference Condition elevations, wetland water levels, and characterization of stressed condition of non-MFL lakes and wetlands. The status counts of MFL constraints and other considerations evaluated for the Baseline Condition indicate that ~~five~~four additional constraints were not met with the increased groundwater withdrawal under this condition compared to the updated 2005 Reference Condition (CFWI, 2015b Appendix F, Table F-3).”

- 22) Chapter 4, Page 92, Figure 11: The title of this figure is “Baseline Condition status of wetland water levels and characterization of stressed condition of non-MFL lakes and wetlands.” This does not appear accurate. The change in head values shown in the figure are either model-simulated SAS or UFA groundwater elevations. Suggest changing the title of this figure to “Baseline Condition status of non-MFL lakes and wetlands”, and adding a note to the figure indicating that the “Change in water level shown is the ECFT model simulation change in [SAS or UFA] groundwater elevation compared to Reference Condition elevations.”
- 23) Chapter 4, Page 94, South Lake County Wellfield - Centralized and Distributed Project: Change the first sentence as follows: “This project is proposed to provide ~~up to~~ 12.7 mgd of finished water to meet projected demands in South Lake County over the 2035 planning horizon.”
- 24) Chapter 4, Table 15: Chapter 4 discusses the environmental evaluations performed in support of the Solutions Planning Phase process. Table 15 includes discussion of results regarding the general range of change in surficial aquifer and Floridan aquifer groundwater levels observed for each modeled scenario. However, the range of fluctuation in groundwater levels does not relate to the environmental constraints. A 1-foot change in surficial aquifer water table does not have relevance to this chapter if that change wasn’t simulated as one of the environmental constraints evaluated as part of this process. The discussion of changes in groundwater levels in this table is not necessary and makes the table cumbersome to the reader. This table should focus on just the environmental evaluation. Other changes in groundwater levels are discussed in the groundwater flow modeling sections of the report.
- 25) Chapter 6, Page 112, Environmental Recovery Projects Section, Second Paragraph, First Sentence: Remove “or flows” after “MFL recovery”.
- 26) Chapter 6, Page 120, Last Sentence: Change this sentence as follows, “Public supply BMPs ranging from irrigation controllers to water audits, would cost approximately \$122 million and result in about 28 mgd in savings. OSS practices would cost an estimated \$18 million to achieve approximately 4.6 mgd in savings.”
- 27) Chapter 6, Page 122, Data, Monitoring, and Investigations Section, First Paragraph, Sixth Sentence: “Based on deficiencies and redundancies in data collection identified in the Solutions Planning Phase...” to “Based on deficiencies and redundancies in current data collection efforts identified as part of the Solutions Planning Phase...”
- 28) Chapter 6, Page 122, Other Investigations Section: Direct Potable Reuse, Fourth Sentence: Suggest starting sentence as follows, “A project to further investigate...”
- 29) Chapter 6, Page 124, Table 17, Reclaimed Water Projects: The quantity listed for Project RENEW, West Ditch Stormwater for Reuse Augmentation, and 160-ac Site Indirect Potable Reuse projects

do not match the quantities listed elsewhere in the Solutions Plan document. The quantities for these projects should be 9.2 mgd, 1.5 mgd, and 5.0 mgd, respectively.

- 30) Chapter 7, Pages 128 and 129, List of Key Findings: Multiple comments:
 - The first bullet should be split into two bullets. The second bullet should start at “Sixteen regional...”
 - In the current second bullet, change the comma after “(Appendix D)” to a period.
 - Add “Conceptual” to the beginning of the current fifth bullet.
- 31) Chapter 7, Page 132, First Paragraph, Third Sentence: Change the text as follows, “These strategies will identify and may include the development of water supply and water resource plans and projects in addition to those included in this plan, when needed to achieve recovery to the established minimum flow or level as soon as practicable, or prevent the existing flow or level from falling below the established minimum flow or level.”
- 32) Chapter 7, Page 133, Support Development & Implementation of Regional Project Solutions Section, First Paragraph of this Subsection: Add “The status of these projects should be included in the annual status report to the Steering Committee.” to this paragraph.
- 33) Chapter 7, Page 134, Surface Water Section: Change the last bullet to read “Create opportunities for conjunctive use of surface water with other water sources.”
- 34) Appendix C, Page C-2, Table C-1: First line of the table (Solutions Project ID GW1), change the project capacity from 12.7 to 12.5 MGD if appropriate to be consistent with the project description that says Montverde will be self-supplied.
- 35) Appendix C, Page C-75, Grove Land Reservoir & Stormwater Treatment Area, Project Description, Groundwater Recharge Bullet Number 2: Please indicate which aquifer is being recharged for clarity.
- 36) Appendix C, Page C-76, Grove Land Reservoir & Stormwater Treatment Area, Project Description, Nutrient Reduction Bullet: Please indicate which watershed(s) are receiving a nutrient reduction benefit for clarity.
- 37) Appendix D, Page D-1, Introduction, Third Paragraph, First Sentence: Suggest changing the sentence as follows, “A project identified for inclusion in the Solutions Plan may not necessarily be selected for development by the listed water supplier(s).”
- 38) Appendix D, Page D-4, Table D-1, Project 3 – Cypress Lake Wellfield: Change estimated completion date from “2017” to “N/A”.
- 39) Appendix E, Page E-24, Scenario 3C, Second Paragraph: Chapter 3 of the Solutions Plan document indicates that 3.4 mgd of groundwater from the UFA will be blended with 6.4 mgd of groundwater from the LFA. The Appendix indicates 3.4 mgd and 6.5 mgd. Suggest correcting these values as appropriate.
- 40) Appendix E, Page E-26, Round 2 Conceptual Management Option Scenarios, Overview, Third Paragraph, First Sentence: Suggest changing “...the potential issue of excessive irrigation rates.” to “...any potential issues associated with the assumed spatial distribution of irrigation.”

- 41) Appendix E, Page E-27, Scenario 4b, Fourth Sentence: Text says, "...adding one hypothetical 2 mgd UFA well (10 mgd finished supply)." Should this be "...adding five hypothetical 2 mgd UFA wells (10 mgd finished supply)."?
- 42) Appendix E, Page E-29, Scenario 2, Second to Last Sentence: Suggest changing as follows, "While significant drawdowns are simulated for the LFA layer within some portions of the LFA, these drawdowns do not extend to the simulated UFA or the simulated SAS layers of the model result in significant drawdowns in the UFA or SAS due to confinement between the UFA and LFA."
- 43) Appendix E, Page E-29, Scenario 2, Last Sentence: This sentence indicates LFA figures will not be repeated through the remainder of this section; however, all the panel figures appear to include the LFA. Suggest correcting this sentence as appropriate.
- 44) Appendices E-1 and E-2, Pages E-49 through E-63, Footer: Footer text on odd pages incorrectly labeled. Correct footer text to read, "Appendix F: Appendix E: Water Resource Assessment".
- 45) Appendix F, Page F-5, Figure F-1: Incorrect figure title of "Figure E-19" should be changed to "Figure F-1". Lakes Apopka (and associated chain), Searcy, Hodge, and East Crystal were not used in CFWI analysis and should be removed from Figure F-1.

Editorial Comments on Draft RWSP Document (May 8, 2015 Public Draft)

- 46) Global Change: Replace the word "historic" with the word "historical."
- 47) Preface, Page i, Second Bullet: Suggest adding "expanding water conservation" to list of strategies provided in second sentence.
- 48) Executive Summary, Page viii, Second Full Paragraph: Suggest changing last half of this sentence to read, "...have documented that the development of traditional water sources is near, has already reached, or, in some areas, has exceeded the sustainable limits" for consistency with how this concept was written in the Solutions Plan document.
- 49) Chapter 3, Page 38, Fourth Paragraph, Last Sentence: The text should be modified to indicate that rulemaking has been initiated and that the draft water reservation has been published regarding the Kissimmee River Basin. Suggest changing this sentence as follows, "~~Contingent upon future Governing Board approval, r~~Rulemaking may be was initiated in 2014 to develop a water reservation rule for the Kissimmee Basin in the CFWI Planning Area."
- 50) Chapter 3, Page 39, Last Paragraph: This paragraph indicates that "freeboard" and "remaining freeboard" are the same thing, which is not accurate. In addition, only adopted MFLs were used as measuring sticks. Suggest using text from Solutions Plan document that distinguishes between the terms "freeboard" and "remaining freeboard" as follows, "Additionally, the adopted ~~or currently proposed~~ MFL sites were used as measuring sticks for evaluations of regional groundwater availability. The allowable changes in UFA potentiometric surface in the vicinity of lakes and wetlands or spring flow at MFL measuring stick locations were based on the differences between adopted MFLs and recent conditions determined through field observation and site specific and regional modeling and statistical evaluations. This allowable change is referred to as "freeboard" and is the magnitude of change that can occur without causing exceedance of an adopted or proposed MFL. Based on the ECFT groundwater model predicted changes in Upper Floridan aquifer (UFA) water levels, spring flows, or groundwater flows, the magnitude of drawdowns of

~~the potentiometric surface of the UFA in the vicinities of the MFL lakes, wetlands, or springs that could occur without causing exceedance of adopted (or proposed) MFLs was estimated. This allowable UFA drawdown is referred to as the MFLs measuring stick “freeboard” or “remaining freeboard.” For each withdrawal condition evaluated in support of the RWSP, the ECFT groundwater flow model predicted changes in UFA potentiometric surface or spring flow were used to develop the “remaining freeboard”. The remaining freeboard represents the approximate amount of additional change in UFA drawdown under the MFL water body, in spring flow, or in groundwater flow that can occur in association with future increases in water withdrawals.”~~

- 51) Chapter 3, Page 41, SJRWMD Section, Third Paragraph, Second Sentence: This paragraph indicates MFL Prevention and Recovery will resume in 2014, which is no longer accurate. Suggest deleting this sentence or updating as appropriate.
- 52) Chapter 3, Page 45, Effects of Climate Change on Water Supply, Second Paragraph: Suggest deleting first four sentences regarding sea-level rise potentially resulting in the migration of population from coastal to inland communities. This RWSP has a 20-year planning horizon. A significant change in the location of Florida’s population due to sea-level rise is unlikely to occur in the current 20-year planning horizon.
- 53) Chapter 4, Page 51, Minimum Flows and Levels Water Bodies, First Paragraph: This paragraph indicates “freeboard” and “remaining freeboard” are the same this, which is not accurate. Suggest updating the text for accuracy and consistency with the Solutions Plan document as follows, “For evaluation of lake, wetland, or spring MFL measuring sticks, the magnitude of estimated drawdown (in feet) of the Upper Floridan aquifer (UFA) potentiometric surface in the vicinity of the MFL sites or springflow (in cfs) that could occur without contributing to exceedance of adopted MFLs was identified for a Reference Condition (2005) and other simulated withdrawal scenarios. ~~This~~The model-predicted change in UFA potentiometric surface or springflow was used to calculate the~~drawdown variable, referred to as “freeboard” or “remaining freeboard”, was expressed as the~~which is the potential or allowable drawdown in the UFA, in feet, for lake or wetland MFLs or springflow, in cfs, for spring MFLs. In cases where current MFLs are not being achieved, the remaining freeboard would be a negative value.”
- 54) Chapter 4, Page 56, Third Paragraph: Suggest rewording sentence as, “The 2005 scenario also corresponds with the most recent land use condition incorporated in the ECFT groundwater model, and is consistent~~was contemporary~~ with the time period when time environmental data were collected at wetland and lake sites in central Florida associated with the CFWI planning effort.”
- 55) Chapter 5, Page 99, Second Paragraph, Second Sentence: The comma is misplaced. This sentence should read, “Opportunities for additional water conservation remain, but, achieving further improvement will become more challenging.”
- 56) Chapter 6, Page 108, Surface Water Section, Second Paragraph, Second Sentence: There are several references to surface water supporting conjunctive use projects, but there is no definition of what constitutes a conjunctive use project. Suggest changing this sentence to incorporate a definition for conjunctive use as follows, “Capturing available flows from these surface water bodies for water supply, particularly to support conjunctive use projects that integrate the use of other sources with surface water in a manner that minimizes any potential harmful effects to the sources, may be effective but can be expected to have varying levels of certainty, depending on climatic conditions.”

- 57) Chapter 6, Page 112, Partial Paragraph at Top of Page, Second Full Sentence: Suggest modifying this sentence as follows, "~~Contingent upon future Governing Board approval, In 2014, rulemaking will be~~was initiated to develop a water reservation rule for the river system, 19 lakes, and the associated floodplain in the CFWI Planning Area." In addition, the follow-on sentence refers to an estimated 25 mgd being currently permitted from the Kissimmee River and KCOL. The technical document released in support of the reservation indicates this is closer to 34 mgd. Suggest updating as appropriate.
- 58) Chapter 6, Page 114, Second Paragraph: There is a misplaced comma. Suggest changing the sentence as follows, "The WSIS included withdrawal scenarios that, simulated the effects of future land use conditions (estimated 2030 land use), future sea levels, and completion of the Upper St. Johns River Basin restoration projects."
- 59) Chapter 6, Page 118, Second Paragraph, First Sentence: This text should read, "In 2010, there were 80 wastewater treatment plants in the CFWI Planning Area..."
- 60) Chapter 7, Page 126, Partial Paragraph at Top of Page, Second Full Sentence: Suggest modifying this sentence as follows, "By using reclaimed water to replace all or a portion of an existing permitted use, a different user or use could initiate and increase to its FAS withdrawal.
- 61) Chapter 7, Page 131, Table 21: Suggest confirming that the table accurately reflects changes made to WSPOs as part of the Solutions Plan.
- 62) Chapter 8, Page 139, First Paragraph: Suggest updating this text to reflect the postponement of KBMOS as follows, "Additional modeling efforts ongoing within the CFWI Planning Area include SWFWMD's District-wide Regulation Model Simulation; ~~the Kissimmee River Modeling and Operations Study;~~ the SJRWMD East Central Florida (ECFT) groundwater model; and the Agricultural Irrigation Requirement Simulation model (AFSIRS)."
- 63) Chapter 8, Page 143, Second paragraph: Suggest mentioning the draft rule and technical document availability. Suggest changing this paragraph as follows, "~~Contingent upon future Governing Board approval, In 2014, rulemaking will be~~was initiated to develop a water reservation rule for 19 lakes and the Kissimmee River system and its associated floodplain in the CFWI Planning Area. The draft rule and technical document for the proposed reservation were published in 2015. As part of this rulemaking effort, the SFWMD will identify the location, timing and ~~amount of water~~lake stage necessary to best manage the system and lakes in order to achieve the approved restoration goals. The modeling tools used to develop the water reservation are currently available to the public to identify and design cooperative projects to store and withdraw surface water."
- 64) Chapter 10, Page 161, Blue Underlined Text in Middle of Page: Modify text as follows, "As described in this CFWI RWSP, fresh groundwater resources alone cannot meet projected future water demands or current permitted allocations without resulting in unacceptable impacts to water resources and related natural systems."
- 65) Chapter 10, Page 163, Last Paragraph: The first sentence of "Next Steps" is not a complete sentence. Please correct accordingly.

- 66) Chapter 11, Page 166, Second Bullet: Replace the text with the following, "Determine the water conservation potential of public supply utilities and assist utilities with analytical work contributing to the development of effective standard or goal-based water conservation plans."
- 67) Chapter 11, Page 167: The bullet list is not presented in a parallel manner (e.g. the 3rd bullet should read, "Coordination of monitoring...") Suggest modifying text accordingly.
- 68) Chapter 11, Page 168, Groundwater Subsection: Add the following bullet to the bullet list, "Support continuing efforts to refine and update the ECFT model so that it may be used as a permitting tool in the future."
- 69) Appendix B, Page B-3, Executive Summary, First Full Paragraph, First Three Sentences: Suggest using text consistent with the Solutions Planning Document similar to the following, "For evaluation of the MFL measuring sticks, the magnitude of drawdown of the potentiometric surface of the UFA in the vicinity of lakes and, wetlands, or springflow MFL sites that can occur without causing violation of established MFLs was characterized as the "freeboard," ~~or "remaining freeboard."~~ Freeboard ~~or remaining freeboard~~ was expressed as the potential or allowable drawdown in the UFA, (in feet) for those lake or wetland MFL sites classified as MFL constraints or other considerations. Similarly, freeboard ~~or remaining freeboard~~ for spring MFL sites was expressed as a flow rate (in cubic feet per second or cfs) ~~and a percentage of the flow associated with the Minimum Flow Regime adopted for MFL springs.~~ For each withdrawal condition evaluated in support of the RWSP, the ECFT groundwater flow model predicted changes in UFA potentiometric surface or spring flow were used to develop the "remaining freeboard". The remaining freeboard represents the approximate amount of additional change in UFA drawdown under the MFL water body or in spring flow that can occur in association with future increases in water withdrawals."
- 70) Appendix B, Page B-23, Table B-5: Lake Searcy has been removed from the priority list and should be removed from this table and all other references (such as Figure B-1). Lake Hiawassee should be omitted from this table as it is no longer scheduled for MFL adoption.
- 71) Appendix B, Page B-28, Section 3, First Full Paragraph: Suggest using text from Solutions Plan document that distinguishes between the terms "freeboard" and "remaining freeboard" as follows, "The magnitude of drawdown of the potentiometric surface of the UFA in the vicinity of lakes and, wetlands or change in springflow at MFLs sites that can occur without causing violation of established MFLs is referred to in this appendix as the "freeboard," ~~or "remaining freeboard."~~ Freeboard ~~or remaining freeboard~~ is expressed as the potential or allowable drawdown in the UFA, in feet, for lake or wetland MFL sites classified as MFL constraints or other considerations. Similarly, freeboard ~~or remaining freeboard~~ for spring MFL sites is expressed as a flow rate (in cubic feet per second or cfs) ~~and percentage of the flow rate associated with the Minimum Flow Regime adopted for MFL springs.~~ For each withdrawal condition evaluated in support of the RWSP, the ECFT groundwater flow model predicted changes in UFA potentiometric surface, spring flow, or groundwater flow were used to develop the "remaining freeboard". The remaining freeboard represents the approximate amount of additional change in UFA drawdown under the MFL water body, in springflow, or in groundwater flow that can occur in association with future increases in water withdrawals."
- 72) Appendix B, Page B-30, Table B-8: Lake Hiawassee should be omitted as it is no longer proposed for adoption.

- 73) Appendix B, Page B-68, Table B-11: Lake Hiawassee should be omitted as it is no longer proposed for adoption.
- 74) Appendix B, Page B-72, Table B-12: Lake Hiawassee should be omitted as it is no longer proposed for adoption.
- 75) Appendix B, Page B-82, First and Third Paragraphs: Lake Hiawassee should be omitted as it is no longer proposed for adoption.
- 76) Appendix B, Page B-90, First and Third Paragraphs: Lake Hiawassee should be omitted as it is no longer proposed for adoption.
- 77) Appendix B, Page B-98, Third Paragraph: Lake Hiawassee should be omitted as it is no longer proposed for adoption.