CFWI Regulatory Team
8/19/2016 Meeting Recap

Items for consideration and future discussion at upcoming Regulatory Team meetings. Items highlighted in yellow denote action items or decision points:

- Rule implementation options
  - Kristine discussed the placement of rules in 62-41 and use of a "supplemental" Applicant's Handbook
    - Following discussion, Kristine agreed to table discussion until we are further in the process
  - Recommended that groups rely on attorney support for drafting options
- Uniform definition of harm
  - Definitions / Conditions for issuance. Significant items discussed include:
    - Copying (g)1-5 into the definition for harmful to the water resources
    - Tabling the significant harm definition it relates to MFLs.
    - Looking at other COI, including 2(h)regarding MFLs and 2(e)regarding adding agriculture to exceptions as a conceptual placeholder.
    - Adding the definition of saline water and fresh water to the definitions (see below on saline water)
    - Updating statutory reference in definition of CFWI. Kristine agreed to update.
  - Water quality impacts from withdrawal. Significant items discussed include:
    - Defining "water source" (e.g., groundwater, surface water, etc.)
    - Utilities' request to include more certainty
  - Dewatering Discharge. Significant items discussed include:
    - Onsite/off-site requirements
    - Not duplicating regulatory requirements of other permits
  - Saline water. Significant items discussed include:
    - A technical support group will submit their names to Len and Kristine by 8/29 and meet separately to discuss whether we should define terms using TDS/chloride and/or numeric limits. They will then bring a recommendation to the group at large.
    - A request to reword back to SFWMD's language for the first paragraph.
    - A request to consider SJRWMD's (a) through (c)
  - Hydrologic alterations. Significant items discussed include:
    - Fixing statutory references and eliminating double negatives, if possible.
    - A request to define delineation in terms of the "landward extent" similar to ERP and a request to be consistent with ERP in terminology.
    - We edited the questions for the EMT slightly after receiving some feedback from those on the WRAT. Questions sent to WRAT include:
      1. Is it possible to apply a wetlands numeric standard for harm to all wetlands (or types of wetlands) across all physiographic regions (or types of regions) of the CFWI with a high reliability that the standard would act as a screening tool for harm and to develop such a tool within 1 year?
      2. Will a model be available and ready to use within 1 year that would allow the districts to consistent apply a numeric standard across the CFWI?

        - Discussed numeric standard, if possible, being a threshold.
        - Discussed proceeding with drafting concepts for narrative criteria. If a numeric standard is possible, narrative would apply only when threshold numeric standard was triggered.
- Landscape irrigation
    - Item tabled until everyone has had chance to review last comment letter received.
    - To be added to the Topic Table.
- Uniform utility conservation
    - DEP and the Districts recommended that conservation group tackle the conservation goal first and table the per capita goal until after the demand team is complete.
    - DEP, the Districts, and the utilities appeared to all agree that the conservation goal would fit into the framework of existing standard and goal-based plans.
    - DEP and the Districts recommended that conservation group work with Amy Brennan on next steps to start to look at the conservation goal in context with the standard and goal-based plan.
    - Once placed in the context of the standard and goal-based plan, the utilities indicated that they would show how the conservation goal would be annualized. More discussion would occur in the future once that is done.
- WRAT update
    - Distribute EMT and HAT presentations from 8/10
    - Send questions to EMT and HAT (see above)

Deadlines

	Action Item	Deadline to Submit Comments
Harm (Kristine)	Submit comments on the g(4) (tables 1 and 2). You may choose to comment on written or verbal comments made by others as well.	September 9
	Technical folks to have met and to send concepts on g(3) (saline water intrusion)	September 9
	Submit comments or proposals for narrative criteria for g(4) (table 3)	September 16
	Kristine to send out third concept draft, inclusive of g(4)	October 14
	Possible f2f	Week of Oct. 17
Irrigation (Mary Ellen)	Landscape Irrigation	September 16
Conservation (Christine)	Conservation	TBD