

- The applicant has proposed to purchase additional offsets associated with the District's Black Creek Water Resource Development Project to address its impact to the Keystone Heights MFLs (Lakes Brooklyn and Geneva).
- SJCUD must continue to demonstrate that its share of all existing and future impacts to MFLs are offset under the related MFL Prevention/ Recovery Strategies.
- With the projects described above, the proposed use will not cause harm under subsection 2.3(h), A.H., Rules 62-41.400 – 62-41.402, F.A.C., and subsection 2.3(j), A.H., and will meet Rule 62-42.300, F.A.C., provided permit conditions are met.

Water Reserved from Use:

- There are no water reservations in St. Johns County pursuant to subsection 373.223(4), F.S., that could be impacted by this withdrawal.

Water Quality/Saline Water Intrusion:

- SJCUD provided an updated Wellfield Optimization Plan that documents efforts to optimize withdrawals and monitor water quality to reduce aquifer water quality changes in the existing and proposed wellfields. The plan includes:
 - Limits for chloride, sulfate and total dissolved solids concentrations in all production and monitoring wells which will serve as an upper threshold that will dictate pumping operations in the wellfields.
 - Processes to address production and monitoring wells that were identified in the 2015 Wellfield Optimization Plan assessment as exceeding the predicted maximum parameters. The updated plan includes steps that will be taken to reduce water quality changes and maintain water quality at acceptable limits in all production and monitoring wells.
 - Use of water quality data analyses and saltwater upconing modeling results to monitor and minimize water quality changes.
 - Additional proposed monitoring wells associated with all new future wellfields to monitor potential changes in hydrologic conditions resulting from SJCUD's pumping.
 - Water level monitoring in existing and proposed monitoring wells, as well as selected production wells.