

## Alignment of PEF's COC for the Freshwater Supply with the Six Step Adaptive Management Process

Permitting Process		Post Permitting – Construction and Operation	Contingencies for Future	
Adaptive Management Process Step	LNP – Initial Water Supply Plan	Revise Plan Based on Findings of APT	If Wellfield Remains in Operation	If AWS is Utilized
1 – Assess the resource management problem	A source of raw water supply is needed for the LNP	Results of APT will determine whether groundwater model needs to be recalibrated and then water use scenarios rerun.	No change, if no unacceptable adverse effects are detected or predicted. Continue to follow the COC.	Complete design and permitting of AWS.
2 – Design the resource management solution	PEF identified a groundwater wellfield on the LNP site and then moved the wellfield to the South Property to minimize the impacts of the proposed groundwater use on wetlands and aquatic ecosystems and their underlying aquifers in the vicinity.	Recalibrate and rerun model as needed, and make adjustments to wellfield design, as needed. In worst case move forward with the design and approval of either an impact mitigation plan, or an AWS.	No change, if no unacceptable adverse effects are detected or predicted. Continue to follow the COC.	Construct and begin operation of new source, as permitted.
3 – Implement the resource management plan	Construction and operation of the well field is constrained by the requirements of COC.	Comply with COC, in particular install/setup monitoring devices and sampling sites, per EMP.	No change, if no unacceptable adverse effects are detected or predicted. Continue to follow the COC.	Implement new or revised EMP, as may be required.
4 – Monitor status and condition of key resource	PEF required to develop and receive approval of APT Plan and EMP.	Commence hydrologic and ecologic monitoring per EMP.	Continue monitoring. If no adverse impacts are detected or predicted, then continue monitoring.	Commence or continue hydrologic and ecologic monitoring, as may be required.
5 – Evaluate monitoring data and compare to initial set of predictions.	PEF required to implement APT and EMP when approved by SWFWMD (and USACE).	Begin data analysis and reporting. Compare monitoring results to unacceptable adverse impact thresholds. If thresholds are, or are projected to be exceeded, then develop plan to mitigate current impacts and/or avoid future impacts.	Compare monitoring results to unacceptable adverse impact thresholds. If unacceptable adverse effects are detected or predicted, then address COC requirements to mitigate impact or develop AWS.	Compare monitoring results to unacceptable adverse impact thresholds.
6 – Adjust the water use plan as needed.	If necessary, PEF will either mitigate unacceptable adverse impacts or implement an AWS.	Adjust the raw water supply plan, as needed.	Adjust raw water supply plan as needed.	Adjust raw water supply plan as needed.