



March 14, 2011

TO:

Board of Mayor and Aldermen

FROM:

Eric Stuckey, City Administrator

Mark Hilty, Water Management Director

SUBJECT:

Consideration of Resolution 2011-18, A RESOLUTION ADOPTING THE CITY OF

FRANKLIN DROUGHT MANAGEMENT PLAN AND AUTHORIZING SUBMITTAL TO THE TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Purpose

The purpose of the City of Franklin Drought Management Plan is to provide for drought response guidance and procedures to be implemented by the City of Franklin Water Management Department.

Background

The City of Franklin is one of 118 community water systems in Tennessee that has been identified by the Tennessee Department of Environment and Conservation (TDEC) as a "system of concern" based on pressure and supply issues encountered during the 2007 drought. The City has been required to develop a Drought Management Plans (DMP) for submittal to TDEC by March 31, 2011. The intent of the plan is to identify drought indicators, establish a course of action to be implemented under various levels of drought conditions, ensure that the essential water needs of the City are met and to provide a basis for regional collaboration.

The City of Franklin has made numerous improvements to the water distribution since the 2007 drought. A few of these improvements include upgrades to the Sneed Road intake structure, rehabilitation to the raw water reservoir, transmission main improvements in the Goose Creek area and the ongoing installation of the Downs Boulevard transmission main.

To date, TDEC has reviewed and approved the outline of the draft Drought Management Plan. Staff is not recommending any changes to the current provisions in Title 18 regarding mandatory conservation.

Financial Impact

The proposed Drought Management Plan should have no financial impact.

Recommendation

Staff recommends adoption of the Drought Management Plan and authority to submit to TDEC for approval.

Enclosure

Resolution 2011-18

RESOLUTION 2011-18

A RESOLUTION ADOPTING THE CITY OF FRANKLIN DROUGHT MANAGEMENT PLAN AND AUTHORIZING SUBMITTAL TO THE TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

WHEREAS, the City of Franklin was identified by the Tennessee Department of Environment and Conservation (TDEC) as a "system of concern" based on pressure and supply issues during the 2007 drought; and

WHEREAS, the City of Franklin is required to submit a Drought Management Plan to TDEC by March 31, 2011; and

WHEREAS, the City of Franklin's Drought Management Plan was developed to meet the goals and intent prescribed by TDEC.

NOW THEREFORE, BE IT RESOLVED BY THE BOARD OF MAYOR AND ALDERMEN OF THE CITY OF FRANKLIN, TENNESSEE THAT:

Section 1. The City of Franklin hereby adopts the attached City of Franklin Drought Management Plan.

Section 2. The Board of Mayor and Aldermen hereby authorizes submittal of the attached City of Franklin Drought Management Plan to TDEC.

Section 3. Changes or revisions to the plan hereby adopted shall be made only by resolution of the Board of Mayor and Aldermen of the City of Franklin.

Section 4. The effective date of this plan shall be immediate upon approval by TDEC.

ADOPTED THIS DAY OF	, 2011.
ATTEST:	CITY OF FRANKLIN, TENNESSEE
By:	By:
ERIC S. STUCKEY City Administrator	DR. KEN MOORE Mayor
Approved as to form by:	
Kristen L. Corn, Staff Attorney	



DROUGHT MANAGEMENT PLAN

DRAFT to Steering Committee for Review

February 2011

City of Franklin - DRAFT DROUGHT MANAGEMENT PLAN

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Section 1.1 - Authority and Status to Plan

The City of Franklin Water Management Department (WMD) is authorized to develop and implement this drought management plan, under the approval of the State of Tennessee Department of Environment and Conservation (TDEC) and adoption by the City's governing Board of Mayor and Aldermen (BOMA). The WMD provides water, wastewater, and reclaimed water services for the citizens of Franklin. The City has collaborated and will continue to collaborate with regional water suppliers and other users of common water resources to develop and implement this plan.

Section 1.2 – Statement of Purpose of the Drought Management Plan

The purpose of this plan is to define the circumstances under which the WMD can advise BOMA to declare a drought at various levels of severity, and outline the City's course of action should a drought occur. While climate patterns can be common across large regions, the impacts of droughts are usually very specific to individual supply systems (systems with large storage capacities can sustain short-droughts but may be susceptible to long term rainfall deficits), which system with river intakes and/or small storage capacities may be more tolerant of long-term rainfall deficits but more susceptible to severe short-term hydrologic stress. This plan is based on Franklin's resources, redundancies, and infrastructure, while taking into consideration regional dependencies.

Section 1.3 – Water System Characteristics and Risks

1.3.1 Sources of Water Supply

The City of Franklin withdraws and treats water from the Harpeth River, a tributary to the Cumberland River, and purchases water from a regional wholesaler, Harpeth Valley Utility District (HVUD). There are limits on the volume of water that Franklin is permitted to withdraw from the Harpeth River, per their Aquatic Resource Alteration Permit (ARAP) effective November 2007 to November 2012. Franklin and HVUD operate under a contractual agreement that specifies minimum and maximum monthly usage, and peak day delivery requirements.

Franklin pumps water from the Harpeth River at river mile 89.2 into an off-line raw water reservoir for treatment and distribution through the City's water treatment facility, in accordance with the following guidelines and the facility capacities. The water supply that is available to Franklin is specified by the 2007 ARAP, which places the following limits on withdrawal at the intake:

- Water in the Harpeth River shall not be reduced below ten cubic feet per second (cfs) as a result of the withdrawal (this flow level occurs approximately 20% of the time)
- Water shall be withdrawn at a rate no greater than 20% of the flow in the river at the intake

The Harpeth River flow is determined at USGS Gage #03432350 at river mile 88.1, just downstream of the water supply intake. Figure 1-1 shows the location of the withdrawal and the USGS gage in Franklin.

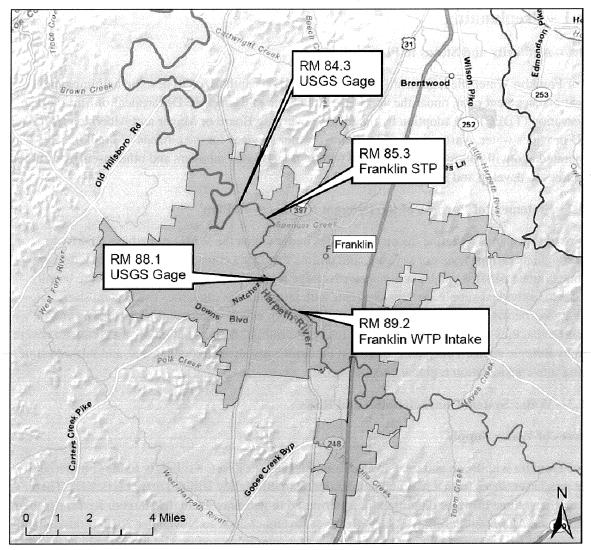


Figure 1-1 Franklin Water Supply Withdrawal on Harpeth River

The current capacity of the Franklin water treatment facility is 2.1 million gallons per day (mgd). As discussed in **Section 1.3.2**, this treatment capacity is not sufficient to meet the City's water demands, requiring the City to purchase wholesale water from HVUD. The current agreement between Franklin and HVUD stipulates the following volumes of treated drinking water be delivered to the City's distribution system:

- Minimum monthly usage by Franklin of 99.7¹ million gallons (mg), or approximately 3.3 mgd
- Maximum monthly usage by Franklin of 218.9¹ mg, or approximately 7.3 mgd, based on projections for 2011
- Peak day delivery to Franklin of 8.8¹ mg (projection for 2011)

¹ City of Franklin 2009 Five Year Projections of Demand For Harpeth Valley Utilities District, June 25, 2009.

Each year, Franklin provides HVUD with a 5-year projection for the volumes listed above. The City purchases from HVUD the volume of water needed to make up the difference between the total demand and the volume produced by the water treatment plant (WTP).

1.3.2 Water Demands

The current estimated total average potable water demand for the City of Franklin is 7.2 mgd. Based on the City's utility billing data for 2009, 74% of the demand is for residential use, 20% is for commercial use, and 6% is used for irrigation. All non-residential accounts are categorized as commercial. The irrigation billing category only includes separate water meters associated with irrigation systems, thereby excluding many residential irrigation uses which are however, reflected in the residential billing category.

Franklin experiences a large seasonal variation in water demands, primarily due to the increased irrigation during the dry summer months. The chart below shows the seasonal variation in water demands based on the 2009 utility billing records. Water demands range from 78% of the annual average in the typically wet month of April to 135% of the annual average in the typically dry month of August.

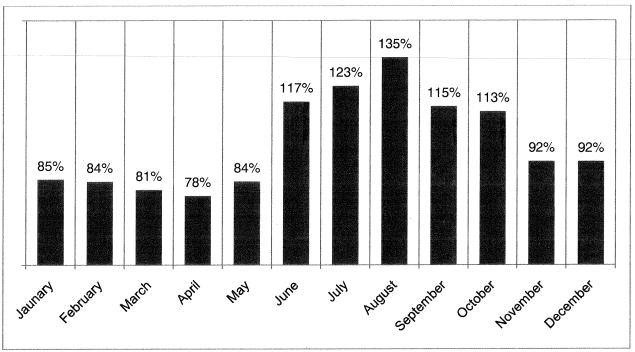


Figure 1-2
Seasonal Variation in Water Demands (2009),
Monthly Average Demand as a Percentage of Annual Average Demand

Section 1.4 – Drought Management Plan within the Context of an Emergency Operations Plan

The Williamson County Emergency Management Agency (WCEMA) coordinates emergency response efforts for the City of Franklin. WCEMA is a regional entity and does not specify an action plan for drought scenarios. During a drought situation, this drought management plan will be implemented in the City of Franklin.

Section 2 – Organizing the Planning Process

Section 2.1 – Planning Process, Public Involvement, and Public Review

This drought management plan has been developed by the City of Franklin WMD, and is to be approved by TDEC and the City's governing BOMA. Prior to final approval, the plan will be available for public review and comment for a period of [INSERT NUMBER] days. Public feedback will be incorporated as appropriate before the final adoption of the plan.

Section 2.2 - Identification of Goals - Objectives and Priorities

The goal of this drought management plan is to lay out a course of action to be implemented under various levels of drought conditions to assure that the essential water needs of the City are met. The plan will also provide a basis for regional collaboration, both in defining a drought situation and establishing actions that will reduce the City of Franklin's demand on regional resources.

Section 2.3 – Larger Resource Planning Context

Franklin purchases treated drinking water from HVUD – water that originates from the Cumberland River – to supplement the available supply from the Harpeth River to meet water demands. Many other communities in the region also rely on HVUD to supply treated Cumberland River water as the primary water supply. Franklin's drought management plan does not supersede the contractual agreement in place between the City and HVUD, but takes into consideration Franklin's dependency on a regional water supply source, and includes regional drought indicators in addition to Franklin's local indicators.

Section 3 – Identify Existing Plans, Partnerships, Policies, and Procedures

Section 3.1 - Interconnections, Mutual Aid Agreements, and Backup Sources

The City of Franklin has a water purchase agreement with the HVUD that stipulates monthly minimum and maximum delivery volume, and a peak daily delivery volume. The 2011 values under this contractual agreement are:

- Minimum monthly usage by Franklin of 99.7 million gallons (mg)
- Maximum monthly usage by Franklin of 218.9 mg (2011 projection)
- Peak day delivery to Franklin of 8.8 mg (2011 projection)

Each year, Franklin and HVUD sign a contractual agreement specifying 5-year projections for these delivery volumes to allow the City and the utility to plan for future needs and expansions.

Section 3.2 – Ordinances, Polices, and Legal Requirements

The City of Franklin's bylaws (**Section 5**) currently define droughts and drought response actions, and in effect, constitute a major portion of this drought management plan at the local level (using local hydrologic indicators). The bylaws identify two emergency status drought phases. Emergency Status 1 occurs when the water treatment reservoir drops to less than a 30 day supply (assuming a treatment rate of 2 mgd) or when two or more distribution tanks throughout the system cannot be brought above two-thirds full within a 48-hour period. Emergency Status 2 occurs when the water treatment reservoir drops to less

than a 15 day supply (assuming a treatment rate of 2 mgd) or when two or more distribution tanks throughout the system cannot be brought above one-quarter full within a 48-hour period. At the current effective reservoir capacity (113 million gallons) and a treatment rate of 2 mgd, the trigger points for dropping below 30 and 15 day supplies are equivalent to 53% and 26.5%, respectively, of the reservoir capacity.

When these emergency conditions occur, the Mayor of the City of Franklin is responsible for declaring a drought emergency status, and is also responsible for terminating the drought emergency status. During these drought conditions, various non-essential uses identified by the City of Franklin may be prohibited. All relevant bylaws will be incorporated in the City of Franklin's Drought Management Plan.

Additionally, the City of Franklin has an Aquatic Resource Alteration Permit (ARAP) issued by TDEC which allows the City of Franklin to withdraw water from the Harpeth River at the water treatment facility intake at a rate that does not exceed 20% of the river flow. Additionally, flow in the river shall not be reduced below 10 cfs as a result of the City's withdrawal.

Section 3.3 – Effectiveness of Water Conservation Measures

When formulating a resource management plan, of any type, it is important to address its likelihood of success, so that implementation of the plan can be effective, rather than having a plan that is a list of good ideas. The City of Franklin already has data demonstrating that the level of success of recent drought management measures, including those within existing bylaws included as part of this drought management plan.

During the 2007 drought, the City of Franklin enacted its drought management measures by implementing drought Emergency Status 1 measures. The City saw limited success with voluntary conservation measures and therefore reduced water demand by locking irrigation meters to customers. This measure succeeded in reducing mid-summer water demands by nearly 30% when comparing the average demand for the 30 days prior to and after the order to cut off the meters was issued. Since 2007, the City has implemented improved communication tools including reaching out to customers through the City website and using social networking applications. There are currently plans to unify the City's public communications plan and enhance the services that are provided by the City's communication manager.

The measures taken by the City to conserve water during the 2007 drought and the resulting change in water demands is summarized in Table 3-1. Figure 3-1 shows the average monthly demands, as a percentage of the average annual demand, for 2007 and 2008, which was a year of average rainfall. Monthly demands in 2007 were greater than what would be expected in an average year, once water users began to feel the effects of the drought in early summer. Once the City implemented measures to reduce demands in June, July and August, customers responded, and the average monthly demands fell below typical summer water usage rates. Thus, public awareness and active measures by the City to restrict irrigation watering have had very beneficial results with respect to demand reductions. Because these same bylaws form a major portion of this drought management plan, past experience indicates that this plan will also be effective for future drought management.

Table 3-1: Effectiveness of Water Conservation Measures in 2007

Date of		Average Daily W	ater Demand (mgd)	Resulting
Action	Action	Previous 30 Days	Subsequent 30 Days	Change in Demand
5/30/2007	Press Release on Monitoring of Water Consumption	7.0	7.7	+ 10%
6/13/2007	Press Release Regarding Voluntary Conservation	7.5	7.6	+ 1%
8/8/2007	Press Release Implementing Status 1 Shortage	7.7	6.8	- 12%
8/21/2007	Order to Cut Off and Lock Irrigation Meters (approximately 200)	7.9	5.7	- 28%
9/14/2007	Press Release Lifting Status 1 Shortage	6.2	7.1	+ 15%
9/22/2007	All irrigation customers returned to service	5.7	7.3	+ 28%

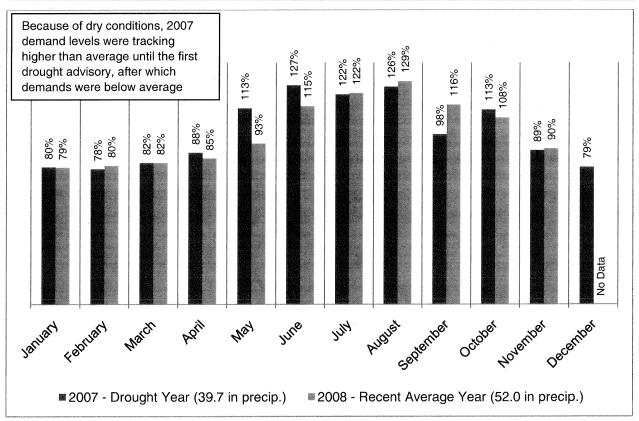


Figure 3-1 Seasonal Variation in Water Demands (2007 and 2008), Monthly Average Demand as a Percentage of Annual Average Demand

Section 4 – Coordinate with State and Regional Agencies

Section 4.1 – Identify Regional Stakeholders and Clarify and Resolve Conflicts

Franklin supplies water for multiple users with various needs, mostly within the City limits. The City withdraws and treats water from the Harpeth River to partially satisfy demand, purchasing the remaining volume from the regional wholesaler HVUD. The City's withdrawal from the Harpeth River is limited by an Aquatic Resource Alteration Permit, issued in 2007 by TDEC. Many other communities in the region also purchase water from HVUD, and many more communities rely on the Cumberland River as a common resource to meet water demands. Franklin's drought management plan takes into account the City's dependency upon a regional water supply, the ecological flows needed by local water resources, and compares Franklin's drought triggers with known regional drought triggers to show that responses to droughts can be easily coordinated.

Section 4.2 – Participation in Regional Water Conservation Efforts

The City of Franklin, as one of many customers, will cooperate with HVUD in the event that regional drought conditions occur. Analysis of historical water level records in the Cumberland River, coupled with modeling of Franklin's allowable withdrawal from the Harpeth River has shown that Franklin's drought triggers would occur before HVUD declarations. Therefore, the City will likely already be conserving water when a drought alert is issued by the regional wholesaler (see Section 4.3 below).

Section 4.3 – Analysis of Franklin versus Regional Drought Triggers

A simulation model of Franklin's water supply system, developed for the ongoing Integrated Water Resources Plan, or IWRP, in collaboration with local, regional, and state stakeholders has been developed to evaluate historical Harpeth River streamflow data, and historical Cumberland River elevation data. The model has allowed estimates of the potential frequency of Franklin's drought triggers to be made for comparison with the historic frequency at which regional droughts would have been declared by HVUD. Water elevation data on the Cumberland River within Cheatham Lake was provided by the US Army Corps of Engineers, who control the reservoir levels. Data show that, at the point of measurement, which is more than 20 miles downstream of HVUD's intake, and drought trigger measurement location, water levels in the reservoir have not been low enough to trigger a regional drought, by HVUD's definition, from 1958 to 2011. According to HVUD's Drought Management Plan, their top drought trigger (Drought Alert) occurs when the water level drops below 382 feet for more than 48 hours. Figure 4-1 shows the historic water levels at the USACE measurement point along with the HVUD drought trigger levels.

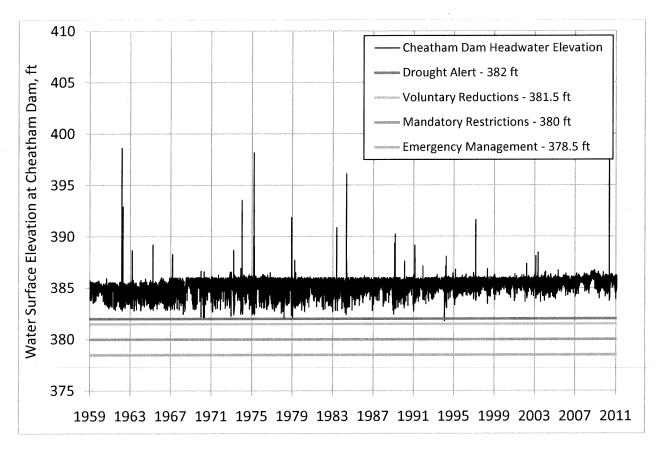


Figure 4-1 Comparison of Historic Data and HVUD Drought Triggers

A complimentary analysis of Harpeth River streamflow from 1975 to 2009, and Franklin's allowable withdrawal shows that the City of Franklin would reach Emergency Status 1 in 28% of months and Emergency Status 2 in 20% of months. This demonstrates that Franklin's drought triggers reflect the increased susceptibility of their local system to hydrologic stress, and that the City can be confident that their bylaws support implementation of conservation measures, should a regional drought declaration be made (see Section 5 for actual response measures outlined in the bylaws).

If this analysis showed the opposite; that is, if HVUD drought triggers were likely to be reached more frequently than Franklin's local triggers, this DMP would need to consider provisions for Franklin to institute conservation measures solely at the request of HVUD based on their regional drought status. As reflected in this analysis, this condition would never have happened over the past 50 years. Thus, HVUD declaring a need for conservation *without* Franklin having already done so would be unlikely in the future, and Franklin can adequately rely on its own local indicators of drought status and conservation needs.

Section 5 – Plan Management Phases and Response

Section 5.1 – Identification of Trigger Points – Emergency Status 1

Emergency Status 1 can be declared by the Board of Mayor and Aldermen (BOMA) based on conditions determined by the Director of the Water Management Department (WMD) of the City of Franklin. As previously discussed, a Water Shortage Emergency Status 1 may be identified when the total volume of water in the City's raw water reservoir drops to less than a 30 day's supply to the WTP operating at a design capacity of 2.0 mgd or when the water level in two or more distribution system reservoirs cannot be brought above the 2/3 full mark in a 48 hour period. Once a Water Shortage Emergency Status 1 is declared, the Mayor may prohibit the use of all Non-essential Category 1 water.

Non-essential Category 1 water uses includes the following:

- Washing sidewalks, driveways, and other exterior paved areas except by the City of Franklin in the interest of public safety
- Filling swimming pools
- Noncommercial washing of vehicles and boats
- Any use from a fire hydrant other than to fight fires
- Watering landscaped or grass areas with the exception of non-grassed gardens, trees, or shrubs between 8P.M. and 6A.M. using handheld devices
- Watering golf courses
- Dust control or compaction during construction

Section 5.2 – Identification of Trigger Points – Emergency Status 2

Emergency Status 2 can be declared by the Mayor of the City of Franklin based on conditions determined by the Director of the Water Management Department of the City of Franklin. As previously described, a Water Shortage Emergency Status 2 may be identified when the total volume of water in the City's raw water reservoir drops to less than a 15 day's supply to the WTP operating at a design capacity of 2.0 MGD or when the water level in two or more distribution system reservoirs cannot be brought above the 1/4 full mark in a 48 hour period. Once a Water Shortage Emergency Status 2 is declared, the mayor may prohibit the use of all non-essential uses. Non-essential water uses include the water uses listed above as Category 1 in addition to Categories 2 and 3 listed below.

Non-essential Category 2:

- Use by a laundromat greater than 70% of the water used in the corresponding billing period of the prior year (or estimated if records are unavailable)
- Use by vehicle washing facility greater than 70% of the water used in the corresponding billing period of the prior year (or estimated if records are unavailable)

- Water sold and supplied to utility districts greater than 70% of the water used in the corresponding billing period of the prior year (or estimated if records are unavailable)
- Non-residential use greater than 70% of the water used in the corresponding billing period of the prior year (or estimated if records are unavailable) provided that such reductions do not impact public health, safety, welfare, or equitably among users
- Drinking water in restaurants, public, or non-public eating establishments unless requested by a customer

Non-essential Category 3:

• Any non-residential use or use by any utility district in excess of 50% of the water used in the corresponding billing period of the prior year (or estimated if records are unavailable)

Effluent reuse or well water uses are exempt from Non-essential use categories.

Table 5-1 below provides a summary of the City of Franklin's drought trigger points and response actions.

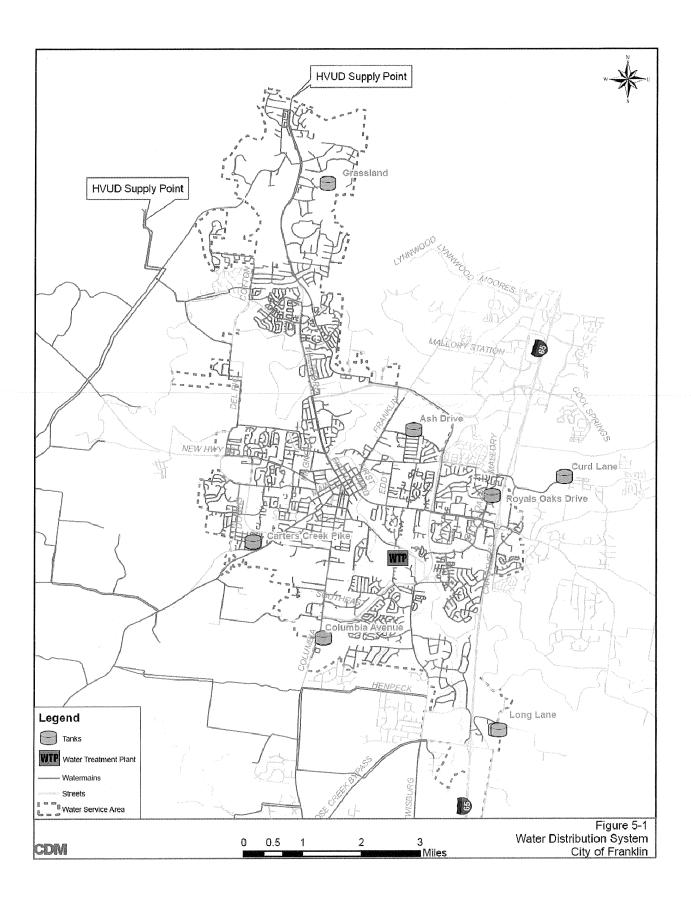
Table 5-1 Franklin Drought Triggers and Associated Actions

Water	Drough	Drought Triggers	
Shortage Status	Raw Water Reservoir	Distribution System	Associated Actions
			Prohibit Non-essential Category 1 Uses, including:
Fmerdency	Volume less than 30-day	Water level in two or more	 Washing sidewalks, driveways, and other exterior paved areas except by the City of Franklin in the interest of public safety Filling swimming pools
Status 1	supply at plant capacity of 2 mgd	brought above 2/3 full for 48	 Non-commercial washing of vehicles and boats Any use from a fire hydrant other than to fight fires Watering landscaped or grass areas with the exception of non-grassed gardens trees or
		nours	shrubs between 8P.M. and 6A.M. using handheld devices • Watering golf courses
			Dust control or compaction during construction
			Prohibit all Non-essential Category Uses, including:
			Category 2 Uses:
			 Use by a laundromat greater than 70% of the water used in the corresponding billing period of the prior year (or estimated if records are unavailable)
			• Use by vehicle washing facility greater than 70% of the water used in the corresponding
	Volume less	Water level in	billing period of the prior year (or estimated if records are unavailable)
Emergency	than 15-day	tanks cannot be	 Water sold and supplied to utility districts greater than 70% of the water used in the corresponding billing period of the prior year (or estimated if records are unavailable)
Status 2	suppiy at plant capacity	brought above	• Non-residential use greater than 70% of the water used in the corresponding billing period of
	of 2 mgd	1/4 full for 48	the prior year (or estimated if records are unavailable) provided that such reductions do not
		5	 Impact public reading, we have you equitably afford users. Drinking water in restaurants, public, or non-public eating establishments unless requested by
			a customer.
			Category 3 Uses:
			• Any non-residential use or use by any utility district in excess of 50% of the water used in the
			corresponding billing period of the prior year (or estimated if records are unavailable)

Section 5.3 – Balancing Supply and Demand

During the 2007 drought, Franklin experienced problems with maintaining pressures in their distribution system (Figure 5-1). Specifically, there were two supply tanks that were vulnerable to low pressures: Columbia Avenue and Long Lane tanks. During the summer of 2007, the Franklin WTP was unable to draw water from the Harpeth River for several weeks in August and September. The low water flow from the WTP to the distribution system was the cause of the low pressure at these two tanks. Since then, the City has discovered that rerouting water supplied by HVUD through the WTP at a minimum flow of 1 mgd addresses this issue, as the plant acts as a booster station to increase pressures to the southern tanks. The City must pay for the extra cost of water pumping in this situation, in addition to the purchase cost from HVUD.

Analysis of the distribution system using a simulation model developed by the City confirms that the "worst case scenario" for pressures in the distribution system occurs when the WTP is not providing water for several days. The model analysis also reinforces the City's existing drought management bylaws listed in Sections 5.1 and 5.2, suggesting that conservation measures should be enacted when water levels in the distribution system tanks cannot be brought above 60% capacity, so that the tanks can refilled, avoiding low pressures. In conclusion, the City is currently managing the distribution system pressures by moving HVUD-supplied water through the WTP when it is not possible to withdraw from the river. This management approach allows the City of to address unanticipated pressure losses arising from supply inconsistencies using the existing drought management bylaws listed in Sections 5.1 and 5.2.



Section 6 – Identify the Management Team

The guidance provided by the Tennessee Department of Environment and Conservation requires that the Drought Management Plan identify the purpose, structure, roles, and functions of the Plan. The City of Franklin Board of Mayor and Aldermen, based on the advice of the Director of the Water Management Department (WMD), is responsible for issuing and lifting drought emergency status declarations. The following is an excerpt from Franklin's water supply shortage ordinances:

Section 18-130 (6) Board of Mayor and Aldermen action.

- (a) The Franklin Board of Mayor and Aldermen may declare a water shortage emergency irrespective of whether the water supply has reached Water Shortage Emergency Status 1 or 2. Only the board may terminate or end a water shortage emergency declared by the board.
- (b) The Franklin Board of Mayor and Aldermen may prohibit any Non-essential Use, Category 1, during any period that a water shortage emergency has been declared, irrespective of whether the water shortage has reached Water Shortage Emergency Status 1 or not.
- (c) The Franklin Board of Mayor and Aldermen may prohibit any Non-essential use when the water supply of the city has reached the Water Shortage Emergency Status 1.
- (d) Any water shortage emergency described by the mayor shall continue until the next meeting of the Franklin Board of Mayor and Aldermen. If the board does not take action to terminate the water shortage emergency, the same shall continue in full force and effect. The board may terminate or modify any limitations on Non-essential use of water. In the absence of affirmative action by the Franklin Board of Mayor and Aldermen, the action of the mayor shall be final.

Section 18-130 (7) Notice.

Upon the declaration of the existence of a water shortage emergency by the mayor or the board, the city recorder shall notify the local newspapers and radio stations and furnish detailed information concerning the existence of the water shortage emergency and all prohibited uses. In addition, a newspaper ad shall be published once per week in any weekly local newspapers, informing the public of the water shortage emergency and any prohibition concerning the Non-essential uses. Every practical effort shall be made to keep the water-using public informed of conditions during any declared water shortage emergency.

The Franklin WMD is responsible for monitoring water consumption, drought trigger measures, and advising BOMA to issue a water shortage emergency.

Section 7 – Review, Evaluate, and Update the Management Plan

This Drought Management Plan and associated actions taken by the City will be reviewed by the Water Management Department (WMD) and the Board of Mayor and Aldermen (BOMA) upon completion of a drought event. If necessary, the Plan will be updated by WMD and re-approved by BOMA. If no drought event occurs, the Plan will be reviewed and updated (as necessary) every five years after its adoption.