

MFL Peer Review Committee Still Finds problems

July 30, 2020

Draft: Chair's Second Peer Review Panel Consensus Report for: Technical Report- Minimum Flows and Minimum Levels Re- Evaluation for the Lower Santa Fe and Ichetucknee Rivers and Priority Springs

PREPARED FOR



Suwannee River Water Management District

The Minimum Flows and Levels (MFLs) Peer Review Committee convened on July 28 for a discussion of the first draft revision of the Suwannee River Water Management District's MFL plan.

The committee is composed of Drs. Louis Motz, Adam Munson and Chair William Dunn, all recognized scientists. They were critical of the first plan, and this criticism continued for the revision.

Dr. Dunn identified 58 issues that still needed solutions, Dr. Motz identified 13 substantive problems and Dr. Munson had eight.

A good deal of the faults exposed dealt with incompleteness and uncertainty, deemed "substantive uncertainties" which the committee translated as risk. This serious evaluation states: "The primary risk is that the water resource values of the Lower Santa Fe and Ichetucknee rivers and their Priority Springs will not be protected from significant harm."

And that, folks, is the whole reason for the MFLs. Or it could be that the reason for the MFLs is to see how much water we can give to water users? Sort of the same thing. The case is that at times it seems that the water users getting their water is more important than keeping the river protected. Why else do we have riverkeepers?

One of the items addressed is one of our pet peeves; the 15 % rule that water managers love. At one time in the past, water districts decided the number 15% was a safe drawdown, and once used it became an established figure. The Peer Committee happily said this change cannot be defended, and that there is no reason to arbitrarily pick that number just because it was once used somewhere else under different circumstances. Extended, if 15% were taken every five years, a point would be reached when there would be no water left.

Interesting to us was the public comment that was discussed at length by the committee as follows:

19. Priority Springs are not protected.
20. Karst hydrology not properly addressed.
21. Problematic implementation of MFL.
22. Significant harm & the 2013 Recovery Plan.
23. Existing MFL exceeded.
24. Proposed MFL will be exceeded.
- 25 . Moratorium & rollback on water use.

Committee members identified 19 – 22 as from Dr. Sam Upchurch and praised them as significant. Items 23-25 were deemed opinion, unvetted or unsubstantiated and discounted.

We recognize that while the committee has no mandate to review public opinion, the District does and must take it into consideration. No. 25 was mentioned as from Dr. Robert Knight of Florida Springs Institute, but was echoed in your writer's oral comments. What makes us believe that No. 25 would fix the river is that it needed no fixing before we humans started messing with it. Maybe opinion, maybe not science, but certainly truth.

Again the obvious and available solution is not considered, most likely because the state thinks the cost is too great. Doing that could even cost the governor and water managers their jobs.