



Upper and Middle Suwannee River Minimum Flows and Levels – Peer Review





Minimum Flows and Minimum Levels (MFLs)

MFLs are required and defined by Florida Statutes in Section 373.042:

Minimum flows and minimum water levels...
...are the limit at which further withdrawals would be significantly harmful to the water resources or ecology of the area.



MFL Development Process

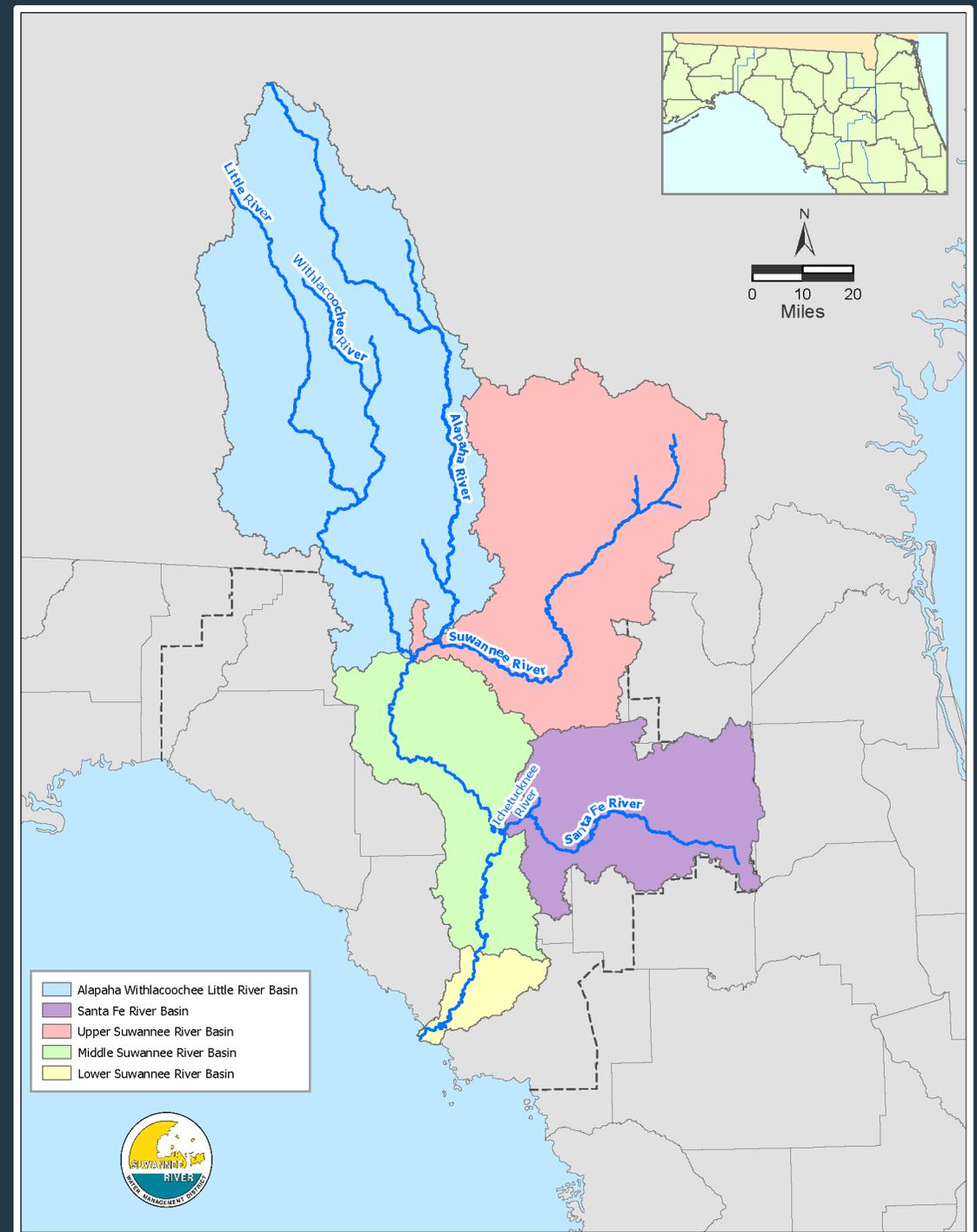
- Data collection
 - Hydrologic and environmental data
- Data analysis, modeling, and reporting
- Peer review and public comment solicitation
 - Technical documents revised as necessary
- Status assessment
 - Recovery/prevention strategy if needed
- Rule development and adoption





Suwannee River Basin

- 9,950 square mile area
 - 57% in Georgia
 - 43% in Florida
- 246 river miles
 - Okefenokee Swamp to Gulf of Mexico
- Second largest river in Florida
- Outstanding Florida Water





How We Got Here

- 2010 – Initial Upper/Middle Suwannee MFL work began
 - SJRWMD led environmental constraints analysis
 - SRWMD led HEC-RAS model development
 - North Florida Southeast Georgia (NFSEG) regional groundwater model
- 2016 – Upper/Middle Suwannee MFL draft reports completed
- 2017 – Peer review of Middle Suwannee MFL draft report
 - MFLs postponed to incorporate peer-reviewed NFSEG model results
 - Outstanding Florida Springs (OFS) MFLs emergency rule adoption
- 2020 – Upper/Middle Suwannee MFL work re-started
- 2022 – Upper/Middle Suwannee MFL draft reports completed

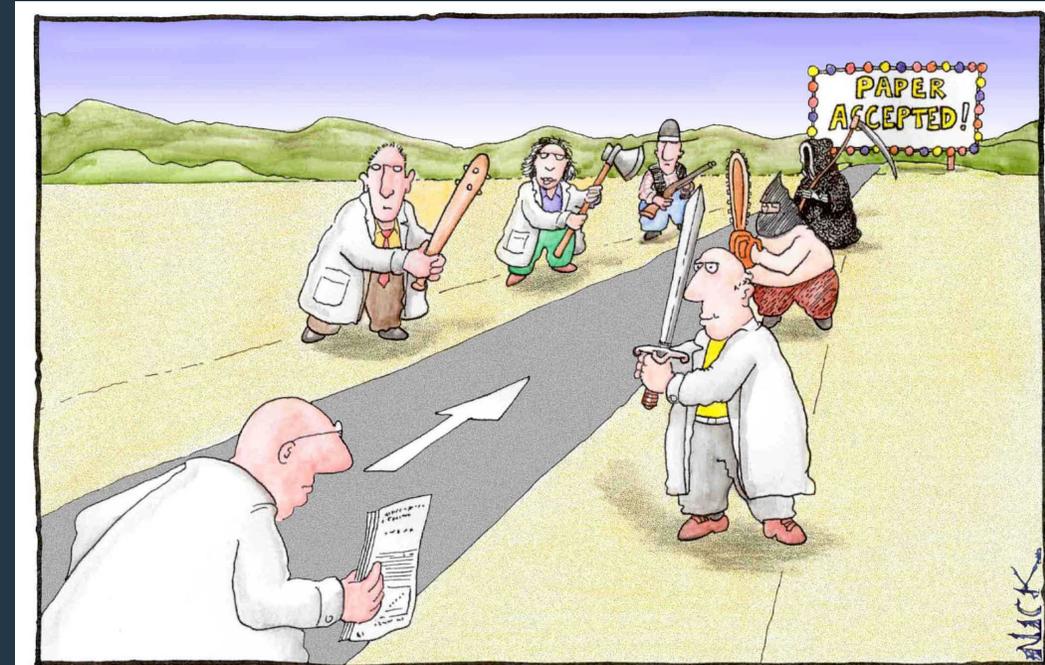


Peer Review

“Evaluation of scientific, academic, or professional work by others working in the same field” – Oxford Languages

Typically used to:

- Improve the quality of technical work
- Maintain the integrity of science
- Provide credibility



Most scientists regarded the new streamlined peer-review process as ‘quite an improvement.’



MFL Peer Review

373.042(6)(a) F.S.

...Independent scientific peer review means review by a panel of independent, recognized experts in the fields of hydrology, hydrogeology, limnology, biology, and other scientific disciplines, to the extent relevant to the establishment of the minimum flow or minimum water level.



MFL Peer Review Process

- Typically contractors are hired for MFL peer review
 - Subject matter experts at consulting firms and/or universities
- The peer review process may include:
 - Kick-off presentation of draft MFL technical work
 - Field trips to pertinent sites
 - Individual peer review of technical work
 - Peer review panel discussion and consensus
 - Peer review consensus report submission
 - District evaluation and response to peer review comments



MFL Peer Review Process

Peer review guidance:

1. Determine whether MFL methods are scientifically reasonable
 - A. Supporting data and information
 - B. Technical assumptions
 - C. Procedures and analyses
2. If a proposed method is not reasonable, the reviewer shall:
 - A. List deficiencies
 - B. Determine if deficiencies can be remedied
 - C. If remedy possible, provide estimates of time/effort for corrections
 - D. If remedy not possible, identify alternative methods



MFL Peer Review Process

Peer review constraints

The following items are outside the scope of this review:

1. Selection of waterbodies for the proposed MFLs
2. Consideration given to structural alterations and their effects on the hydrology of a waterbody
3. Methods used for establishing MFLs for other waterbodies
4. Selection of best available models (e.g., HEC-RAS, NFSEG)
5. Standard procedures for data collection



MFL Peer Review Form

Comment No.	Figure, Table, or Page and Paragraph Number	Does Comment Directly and Materially Affect Conclusions of Report? (Yes/No)	To be completed by Reviewer(s)		To be completed by report author(s)
			A. Reviewer's Specific Comments	B. Reviewer's Specific Recommended Corrective Action	C. Action to be Taken in Response to Comment
1					
2					
3					
4					
5					
6					
7					
8					



Upper and Middle Suwannee River MFL Peer Review Panelists

Dr. Gregg Jones (Chair) – Brown and Caldwell

Dr. Adam Munson – University of Florida

Dr. Martin Hamel – University of Georgia



Next Steps

- Peer review and public comment solicitation
 - Up to four subsequent virtual meetings (dates TBD)
 - Peer review consensus report submission
- District response to comments
 - Technical documents revised as necessary
- MFL Status Assessment
- Final MFLs presented to District governing board
 - FDEP to lead the rule development process



Questions?

