

COMMENT CARD

**SUWANNEE RIVER WATER MANAGEMENT DISTRICT
UPPER AND MIDDLE SUWANNEE RIVER MFLS PEER REVIEW KICKOFF MEETING
MARCH 15, 2023**

NAME: Rob Denis

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COMMENT

THE AUDIO FROM THIS MEETING IS BEING RECORDED.

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NAME: CHARLES STANLEY (Florida Farm Bureau Forestry)

ADDRESS: Country Club Rd

PHONE NUMBER: 904 444 4444 **EMAIL ADDRESS:** Don Rich

COMMENT

WATER MANAGEMENT DISTRICT

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UPPER AND MIDDLE SUWANNEE RIVER MFLS PEER REVIEW KICKOFF MEETING
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NAME: John S. Quastler, Jr.

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COMMENT

Need water withdrawn 1m³s,
Need better agriates recharge than pipes.
Instead sink wells at bottom of
planted pine ditches.

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Upper and Middle Suwannee River MFLs

Observations from Initial Review for Consideration by Peer Reviewers

Rob Denis, PE, D.WRE

March 15, 2023

Comment #1

RTF Development Should be Fully Documented

- The Reference Timeframe Flow (RTF) is a critical part of the MFL setting process
- Among other purposes, it is used to define allowable change
- Appendix VII of the MSR and Appendix C of the USR Reports present the RTF development
 - These are detailed writeups for the LSFR at Ft. White, not the USR/MSR
 - Data or specific information about the Suwannee River not provided
- We strongly recommend full documentation of the RTF development for each MFL location

Comment #2

Reconcile Potential Inconsistencies Between RTF and NFSEG

- Adjustment factors show the impact of groundwater withdrawals and return flows
 - Based on several estimates and factors from NFSEG
- From adjustment method, MFL would be currently met
- Based on NFSEG, the MFL would be currently violated
- These should be consistent

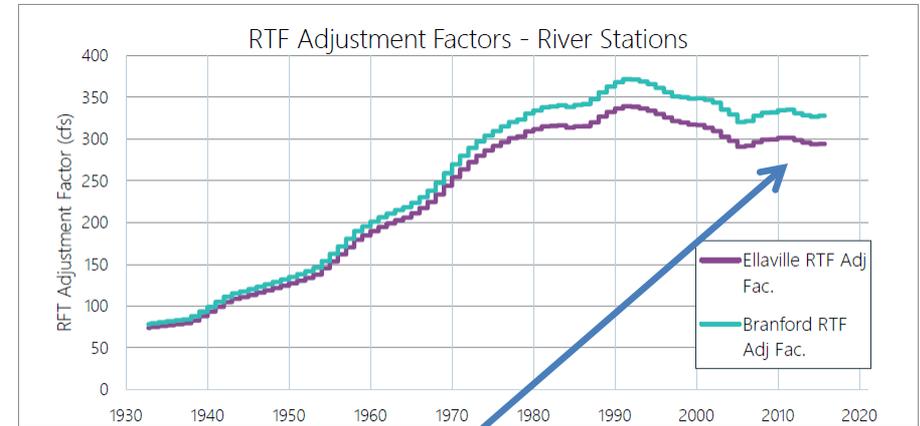


Figure 2-29. Ellaville and Branford RTF adjustment factors

Current adjustment:	MFL allowable change:
Ellaville ~295 cfs	Ellaville ~346 cfs
Branford ~360 cfs	Branford ~400 cfs

Change from NFSEG (Pumps off to Current):
Ellaville ~387 cfs
Branford ~432 cfs

Comment #3

Peer Reviewers Should Review & Comment on the MFL Assessment

- Peer review only addresses a portion of the MFL process
 - The development of the proposed MFL flow rates
 - The calculated allowable change in flow
- Peer review does not address how the MFL will be assessed
- Why does this matter?
 - MFL assessment methodology is complex
 - The assessment should be consistent with the MFL setting process
 - Without a valid reviewed assessment, the impact of consumptive uses of the MFLs is unknown
- We recommend the peer reviewers consider requesting the opportunity to review the assessment methodology or commenting on the importance of consistency in the methods