

Good morning Andrew,

Pursuant to "Standard Peer Review Process for Minimum Flows and Levels and Water Reservations within the Central Florida Water Initiative Area," the St. Johns River Water Management District (District) has solicited stakeholder input in the selection of peer reviewers for the re-evaluation of the Sylvan Lake MFLs, and a peer review selection workshop was hosted by the District on August 12, 2020. The purpose of this email is to provide you with comments on behalf of Orange County Utilities regarding this process.

Presently, the District proposes to use one firm to provide peer review of the final proposed MFL for Sylvan Lake. The review by the selected firm would supplement a previous review of a portion of the MFL, namely the hydrologic modeling, by another firm. In total, two firms will have reviewed the MFL or portions of the MFL. However, the "Standard Peer Review Process for Minimum Flows and Levels and Water Reservations within the Central Florida Water Initiative Area," states:

"Depending on budgetary constraints and specific MFLs or reservation attributes, three or more reviewers with expertise representing each major subject area relevant to the evaluations (e.g., biology, ecology, hydrology, modeling) may be selected."

As such, we believe that three or more reviewers should be the default and the addition of another peer reviewer would allow the District to meet this minimum commitment. Furthermore, as discussed below, we believe that the specific MFL attributes of Sylvan Lake fully justifies this minimum level of peer review. As noted above, such attributes are a factor that must be considered by the District.

Currently, Sylvan Lake is not classified as being in prevention or recovery. Yet at the CFWI Regional Water Supply Plan workshop on April 23, 2020, the water management districts announced that evaluations showed that Sylvan Lake was in recovery by 0.5 feet. However, at the peer reviewer selection workshop on August 12, 2020, the District indicated that updated evaluations now showed that Sylvan Lake had a small amount of freeboard. Because of the potential change in status to prevention or recovery, and to increase stakeholder confidence in the results, given the conflicting public statements about this MFL, we strongly believe that additional peer review, through the addition of another reviewer, is warranted.

By implementing our recommendation above, the peer reviewer selection process will better align with the collaborative CFWI process. If you have any questions about these comments, please don't hesitate to contact me.

Sincerely,

Rob

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