

## Comments on Proposed Sylvan Lake MFL



Rob Denis <rdenis@liquidsolutionsgroup.com>

To Andrew Sutherland

Cc Fatih Gordu; Mike Register; Teresa.Remudo@ocfl.net

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Tue 4/13/2021 4:25 PM

You replied to this message on 4/14/2021 7:18 AM.

Good afternoon Andrew,

On behalf of Orange County Utilities, we wanted to provide additional comments on the proposed Sylvan Lake MFL. Specifically, we believe that in this case, the use of the P50 lake level value alone, as proposed by the District, is appropriate and adoption of other minimum levels (e.g., other P-values) are not required to protect the water resources associated with Sylvan Lake. The recommended minimum P50 value proposed by the SJRWMD was calculated from the "lake level time series that just meets the most constraining levels (FH and FL)." The recommended minimum P50 level is protective of all 10 water resource values (WRV) assessed as part of the Sylvan Lake Minimum Levels Reevaluation study.

While there are some variations in the MFL analysis across different hydrologic regimes, the MFL is based on the expected long-term condition as presented in the draft MFL report. Additionally, the calculated MFL condition for Sylvan Lake shows an interquartile range (P75 to P25) of lake stages of less than 3 feet which further justifies the use of only the P50 water level.

Furthermore, we believe that the use of a single MFL value provides a reasonable balance between full protection of the water body and regulatory complexity. Lastly, the SJRWMD proposes to evaluate the MFL approximately every five years. During this analysis, the SJRWMD will "monitor the status of the adopted minimum P50 for Sylvan Lake" and the "MFL status will also be monitored periodically by reviewing multiple exceedance curve percentiles, updated with post current-pumping condition (i.e., observed) water levels." This adaptive management technique provides additional justification that the use of the P50 water level alone is appropriate and protective.

Thank you for consideration of these comments. Please let me know if you have any questions.

Sincerely,

Rob

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