

**From:** Joanne Chamberlain  
**To:** ["Rob Denis"](#)  
**Cc:** [Andrew Sutherland](#); ["Mary.Thomas@wsp.com"](#); ["bmegic@liquidsolutionsgroup.com"](#); ["Dale.Helms@wsp.com"](#); ["Teresa.Remudo-Fries"](#); ["Christine.Doan"](#); ["Tad.Parker@ocfl.net"](#); ["Lynette.Strong@ocfl.net"](#)  
**Subject:** FW: Comments on Wekiva Basin Peer Review  
**Date:** Friday, September 14, 2018 2:55:00 PM

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Hi Rob,

Thank you for your comments. Please see responses below in italic. We will have the Wekiva MFLs webpage up early next week and will post the meeting materials including this email with comments and responses.

Thanks  
Joanne

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**From:** Andrew Sutherland  
**Sent:** Thursday, August 23, 2018 5:41 PM  
**To:** Joanne Chamberlain <jchamber@sjrwmd.com>; Fatih Gordu <fgordu@sjrwmd.com>  
**Subject:** Fwd: Comments on Wekiva Basin Peer Review

----- Original message -----

From: Rob Denis <[rdenis@liquidsolutionsgroup.com](mailto:rdenis@liquidsolutionsgroup.com)>  
Date: 8/23/18 3:56 PM (GMT-05:00)  
To: Andrew Sutherland <[asutherl@sjrwmd.com](mailto:asutherl@sjrwmd.com)>  
Cc: "Thomas, Mary Fickert" <[Mary.Thomas@wsp.com](mailto:Mary.Thomas@wsp.com)>, Brian Megic <[bmegic@liquidsolutionsgroup.com](mailto:bmegic@liquidsolutionsgroup.com)>, "Helms, A. Dale" <[Dale.Helms@wsp.com](mailto:Dale.Helms@wsp.com)>, "Remudo-Fries, Teresa" <[Teresa.Remudo-Fries@ocfl.net](mailto:Teresa.Remudo-Fries@ocfl.net)>, "Doan, Christine" <[Christine.Doan@ocfl.net](mailto:Christine.Doan@ocfl.net)>, [Tad.Parker@ocfl.net](mailto:Tad.Parker@ocfl.net), [Lynette.Strong@ocfl.net](mailto:Lynette.Strong@ocfl.net)  
Subject: Comments on Wekiva Basin Peer Review

Good afternoon Andrew:

On August 16, 2018, the St. Johns River Water Management District (SJRWMD) held a Minimum Flows and Levels (MFL) Workshop to discuss the peer review of the Wekiva Basin MFLs. The SJRWMD prepared a short presentation which provided an overview of the peer review process for the Wekiva Basin and an overall schedule of the MFL development process for Wekiva Basin water bodies.

Based on the discussion at the meeting, the SJRWMD has proposed dividing the peer review of the Wekiva Basin water bodies into two components – 1) the surface water models and 2) the overall MFL which additionally includes ecology, water resource, hydrology, and freeboard analyses. The primary focus of the meeting was on the peer review of the surface water models being developed by SJRWMD staff and which are being finalized.

As such, the purpose of the meeting was to solicit stakeholder feedback on the following elements of the model peer review:

1. Peer reviewer selection criteria
2. The SJRWMD's peer reviewer ranking
3. Proposed scope of work for the peer review

As requested, we have developed the following comments on behalf of Orange County:

1. The peer review of the Upper Ocklawaha River Basin HSPF model included 3 separate peer review firms. Given the importance of the Wekiva Basin water bodies to the Central Florida Water Initiative (CFWI) effort, we recommend that at least 3 peer review firms also be engaged for this effort.

*Response: The Upper Ocklawaha River Basin (UORB) MFLs peer review panel was formed to review the UORB HSPF model and subsequent MFLs determination report. Although this resulted in a panel with expertise representing all the major subject areas relevant to the overall MFLs determination, it also resulted in some reviewers commenting on areas outside their expertise. At the workshop, District staff discussed a modification to the UORB peer review approach to ensure peer reviewers' expertise are aligned with the product being reviewed, while maintaining the intent of the guidelines. We believe the proposed approach achieves this goal.*

*The Wekiva Basin HSPF/HEC-RAS models are complete and will be used to support the development and assessment of multiple MFLs within the basin. Reviewing the models before the MFLs determination report will allow District staff to revise the model if needed, prior to completing the draft MFLs report. The District selected 2 firms (Intera and DSLLC) with expertise in HSPF/HEC-RAS models for this review.*

*In the spring of 2019, we will complete the selection of the peer review panel for the overall MFL component, consisting of at least 3 reviewers with expertise representing all the major subject areas relevant to the MFLs determination report. One of the three reviewers has already been selected. The panel will include Intera (Wekiva Basin model peer reviewer) who will have the primary responsibility of reviewing hydrologic analyses and any changes to the Wekiva Basin surface water models. Intera was selected because they have experience with the role of models in developing and accessing MFLs at the SJRWMD.*

*We concur on the importance of the Wekiva Basin water bodies and believe this approach focuses on the individual peer review needs of each product, maintains the intent of the CFWI peer review process, utilizes more than 3 peer reviewers, and will ensure a comprehensive and open peer review of the Wekiva Basin HSPF/HEC-RAS models and MFLs determination report(s).*

2. The SJRWMD's list of proposed peer reviewers includes firms with more than one professional. Given that the "Standard Peer Review Process for Minimum Flows and Levels

and Water Reservations within the Central Florida Water Initiative Area” developed by the Central Florida Water Initiative Minimum Flows and Levels and Reservations Team and dated March 2014 (CFWI MFL Standards) require peer reviewers to “work together only at all publically noticed workshops and teleconference meetings”, if multiple reviewers are selected from a single firm, then what will be the process for reviewers within that firm to maintain independence and work together only in public forums? One approach to address this requirement would be to assign one representative of each firm to the peer review panel.

*Response: The district agrees and will have only one representative from a firm on the panel.*

3. The CFWI MFL Standards require that the peer reviewers “develop a single peer-review report” and “identification of a panel chair”. Please clarify how the panel format will meet the CFWI MFL Standards.

*Response: As mentioned previously, the district will complete selection of a peer review panel in spring of 2019, of at least 3 reviewers, with expertise representing all the major subject areas relevant to the MFLs determination report. The MFLs report peer review panel will include “identification of a panel chair” and will produce “a single peer-review report”. The review of the Wekiva Basin models will not include a chair and will result in two independent peer review reports. The district will address all comments received from both model reviewers. During the peer review of the MFLs report, Intera will be responsible for reviewing any changes the SJRWMD makes to the Wekiva Basin models as a result of that peer review effort.*

4. The proposed scope of work should include a subtask for the peer reviewers and SJRWMD to coordinate on how the surface water models will be used, both technically and in policy decisions. This would include a very detailed explanation by the SJRWMD of the step-by-step mechanics of how the models would be used and how the models will interface with separate groundwater modeling efforts. The proposed scope of work should also be clear on the simulations that will be provided to and reviewed by the peer review panel (e.g., calibration, verification, baseline condition(s), etc.).

*Response: The district agrees and will do this at the kickoff meeting.*

5. The proposed scope of work includes a kick-off meeting and a public workshop for the peer review panel to present their “initial findings”. However, the scope does not appear to include a second public workshop for the peer review panel to present any final findings or conclusions prior to submittal to the SJRWMD. We recommend an additional workshop be added to the scope to enhance the public outreach and participation for this effort.

*Response: An additional meeting (teleconference) has been added to the scope of work.*

6. Task B.3 of the proposed scope of work indicates the peer review panel shall consider and respond to stakeholder comments from the public workshop. Task B.2 references

comments being submitted by stakeholders that are in addition to comments raised by stakeholders at the public workshop. The proposed scope of work (Task B.3) should be modified to include the peer review panel responding to comments received at the public workshop and any subsequently submitted comments.

*Response: The scope of work will be clarified to say the peer reviewers will address comments in their draft report.*

7. The CFWI MFL Standards indicates that the MFL peer review scope of services should include any necessary follow-up services. We recommend adding a subtask to re-engage the peer review panel to review any changes the SJRWMD makes to the hydrologic models as a result of the peer review panels.

*Response: The district agrees. During the peer review of the MFLs report, Intera will be responsible for reviewing any changes the SJRWMD makes to the Wekiva Basin models as a result of that peer review effort.*

If you have any questions about these comments, please let me know.

Sincerely,

Rob