

In response to published concerns from former Gov. MacKay and Ocala trial lawyer Bruce Kaster about minimum flows and levels (MFLs) for Silver Springs: MFLs define a protective limit on the amount of available water beyond which further water withdrawals would be significantly harmful to Silver Springs. Prior to the emergency rule for Silver Springs becoming effective April 12, 2017, no such limit existed or was ever proposed for adoption by previous administrations.

Our primary goal in setting MFLs for Silver Springs is to ensure our most iconic spring is protected from groundwater pumping. The MFLs for Silver Springs ensure 94 percent of the long-term historical flow of Silver Springs is maintained. The 6 percent change from historical flow due to water withdrawals is well within the range of other spring MFLs in Florida. In fact, this allowable change is actually below the average allowed by other MFLs.

MFLs are not meant to address rainfall deficits or other natural phenomena. During drought conditions, flows will be lower and during periods of above normal rainfall flows will increase. The MFLs protect the ecology of the area by ensuring water withdrawals will not cause these natural highs and lows to occur at different frequencies or durations beyond what would be expected due to the natural fluctuations.

Data show lack of rainfall and other natural phenomena are the primary causes for Silver Springs' reduction in flow. Groundwater pumping does indeed play a role, just not as much as critics want you to believe. It can be tempting to blame something that is more under our control – like water withdrawals, instead of rainfall deficits. However, the purpose of the MFL program is to address effects of water withdrawals and set limit of these withdrawals necessary to protect the resource.

Many of the ecosystems changes that have occurred at Silver Springs are due to increasing nutrient levels. These nutrient issues are being addressed through the Florida Department of Environmental Protection's Total Maximum Daily Load (TMDL) and Basin Management Action Plan (BMAP) programs.

My staff did not — would not — manipulate data, nor would I ever ask them to. Frankly, I'm offended on the behalf of the many remarkable district public servants who worked tirelessly to meet the July 1 deadline to adopt MFLs to protect our Outstanding Florida Springs. The published letter does an enormous disservice to district staff, as well as the administrative law process in which those who had concerns regarding the MFL were provided an opportunity to present expert testimony and evidence regarding their concerns to an administrative law judge. After a full and fair hearing, the district's MFL was upheld.

To say the district is doing nothing to restore the health of Silver Springs is also woefully inaccurate. Projects to improve the health of Florida's springs and their ecosystems are a major component of the district's Springs Protection Initiative.

Since 2014, nearly 80 projects protecting spring water flow and water quality have been funded through district cost-share programs. The district has contributed more than \$35 million toward vital springs protection projects throughout the district, resulting in more than 62 million gallons of alternative water supplied and 4 mgd conserved. These projects also have reduced total nitrogen to priority spring systems by 990,000 pounds and total phosphorus by 19,400 pounds.

If actions do speak louder than words, the district demonstrates its strong commitment to springs protection and restoration through its cost-share partnership, water supply planning, land acquisition (such as our 2015 purchase of Silver Springs Forest Conservation Area), water conservation, data collection and analysis, regulatory and community outreach programs.

We remain committed to working with other likeminded individuals who are equally committed to continuing the progress we've made toward protecting and restoring this treasured natural resource, Silver Springs.

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