



Ichetucknee Alliance, Inc.
P. O. Box 945 • High Springs, Florida • 32655-0945

December 16, 2013

Ann Shortelle, Executive Director
Suwannee River Water Management District
9225 County Road 49
Live Oak, FL 32060

Dear Ms. Shortelle:

The Ichetucknee Alliance (IA) is a new nonprofit corporation created to restore, protect and preserve the Ichetucknee River System. Our members carry forward the collective wisdom gained over 15 years by the former Ichetucknee Springs Basin Working Group.

The Ichetucknee Alliance has gone on record with the Suwannee River Water Management District in favor of MFLs that restore the flow of the Ichetucknee River to its historic level of 350 cubic feet per second (cfs). We believe that the baseline flow information used to compute the MFL minimizes the problems that are being experienced by the Ichetucknee River. Specifically, we believe the flow information utilized is inconsistent with and fails to address the evidence established by the U.S. Geological Survey of a net flow reduction of about 25 percent in the Ichetucknee from 1900 to the present, a flow reduction caused by factors *other than* rainfall (see flow graph in the Howard T. Odum Florida Springs Institute's Ichetucknee Springs & River Restoration Action Plan, p. 11).

We understand that science can be an imperfect process and that different scientists examining the same problem can reach different conclusions, depending on the data they choose to examine and the manipulations to which they subject that data. For example, the SRWMD, the SJRWMD, and the Florida Springs Institute have all reached different conclusions about flow levels and MFLs in the Lower Santa Fe and Ichetucknee rivers.

In such cases where science does not provide clear guidance, the IA promotes the idea of the Precautionary or Conservative Principle: When in doubt, choose the action likely to cause the least amount of harm. We believe that the current process has not conformed to the Conservative Principle and has not resulted in MFLs that will accomplish our goal of restoring flow to the Ichetucknee River. In addition to the scientific and economic dimensions of the MFL process, the Alliance urges the consideration of an ethical dimension inherent in the entire MFL process:

Does our generation have the right to deprive future generations of the benefits of a natural

system that has existed for thousands of years?

The Alliance is also deeply concerned over the track record of MFL enforcement in Florida. Clearly, the MFL process is worse than useless without rigorous monitoring, enforcement and adjustment, as required by accumulated scientific evidence. We use the words "worse than useless" because the mere establishment of MFLs has been used as cover for the prolongation of present patterns of consumptive use that have led to the present dire state. As an example, we cite the situation in Keystone Heights where new, lower MFLs are being proposed in light of a lack of consensus for restoration after lake levels have continued to fall. We refer you to the article by Robert Williams, Esq., on the Ichetucknee Alliance's website at:
<http://ichetuckneealliance.org/robert-williams-esq-on-ichetucknee-mfls/>

The mission of the Ichetucknee Alliance continues to be restoration of the historical level of flow in the Ichetucknee River and the restoration of the river's historic water quality. While we regard the proposed MFLs as being woefully inadequate to achieve those goals, we support and appreciate the long-overdue establishment of MFLs and creation of a Recovery Plan for the Ichetucknee as a critically important, official acknowledgment of the threat faced by this Outstanding Florida Water (OFW). We recognize that even with this OFW designation, the Ichetucknee has no protection whatsoever without MFLs.

When the MFLs are set and the Recovery Plan is officially adopted, the IA stands willing, ready and able to work with SRWMD to meet and then exceed the goals of the Recovery Plan. At the same time, the IA plans to be a force for accountability in implementation of the Recovery Plan.

Sincerely yours,



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