

From: [Holland Drake](#)
To: [Jason Hood](#)
Cc: ["Michael Lancaster"](#); ["brooke adams"](#); ["bob drake"](#); ["Ann Louise Drake"](#); ["Ann Louise Drake MacKay Drake"](#); ["Rex Farrior"](#); ["laura humbel"](#); ["bo botkin lancaster"](#); ["David - Belleview High School Lancaster"](#); ["lisa lancaster"](#); [info@markemeryfilms.com](#); [Gary E. Williams](#); [BKnight@FloridaSpringsInstitute.org](#); [trustendrake@embarqmail.com](#); ["Steven Redrick"](#)
Subject: Gum Springs MFL Workshop
Date: Wednesday, April 04, 2012 10:11:22 AM

FROM: DRAKE RANCH, Dunnellon, FL. A landowner along Gum Slough

TO:

Jason Hood
Environmental Scientist
Ecologic Evaluation Section
Southwest FL Water Mgt. District
(352) 796-7211 (EXT. 4192) (Office)
(352) 279-0324 (Cell)

Dear Jason,

Robert L. Knight, Ph.D., Director Howard T. Odum Florida Springs Institute
(<http://floridaspringsinstitute.org/>), wrote (Please review his full correspondences below):

"My recommendations to the District: no additional flow reductions allowed by this MFL; continue to collect flow data and set a firm date to revisit the MFL in no more than 10 years"....."This proposed flow reduction is 38% of the low flow for this spring run, well past the point of the District's definition of "significant harm"..... "Based on my accumulating knowledge about how springs work, I would recommend no more than a 5% flow reduction to result in de minimus harm."..... "The District estimates with their groundwater model that average flows have already been reduced by 4% from historic levels. I will recommend that there is considerable uncertainty in this estimate and that to "Do No Harm" they should not allow any additional permitted withdrawals in this springshed until they have at least 20 years of flow records and a better understanding of what is normal and what is impaired"

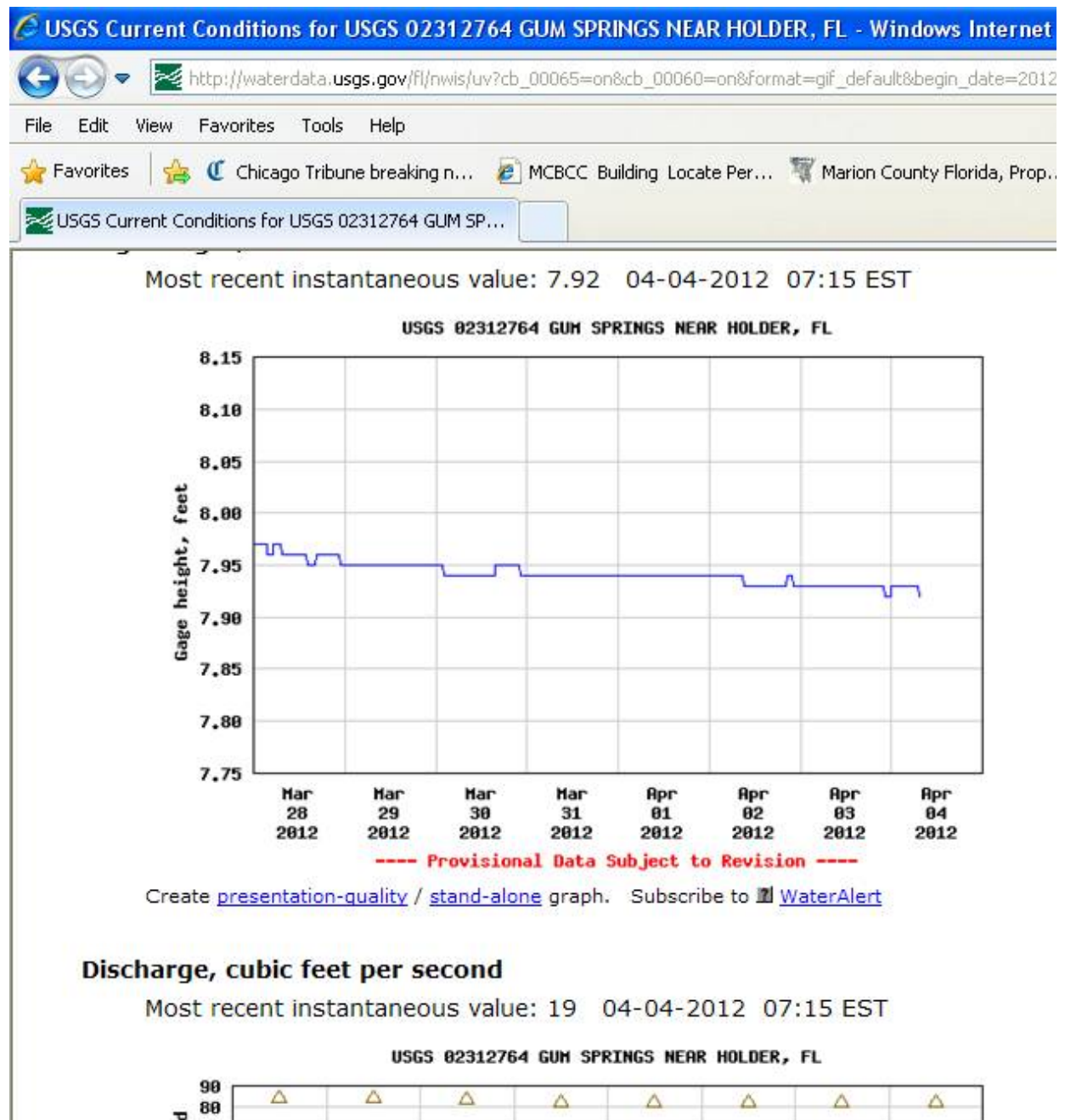
Gum slough is in terrible shape this week, the extremely low water and I imagine the nitrate concentrations are leaving a sad scar. The run does not look pristine anymore and it is getting all grown up with weeds.

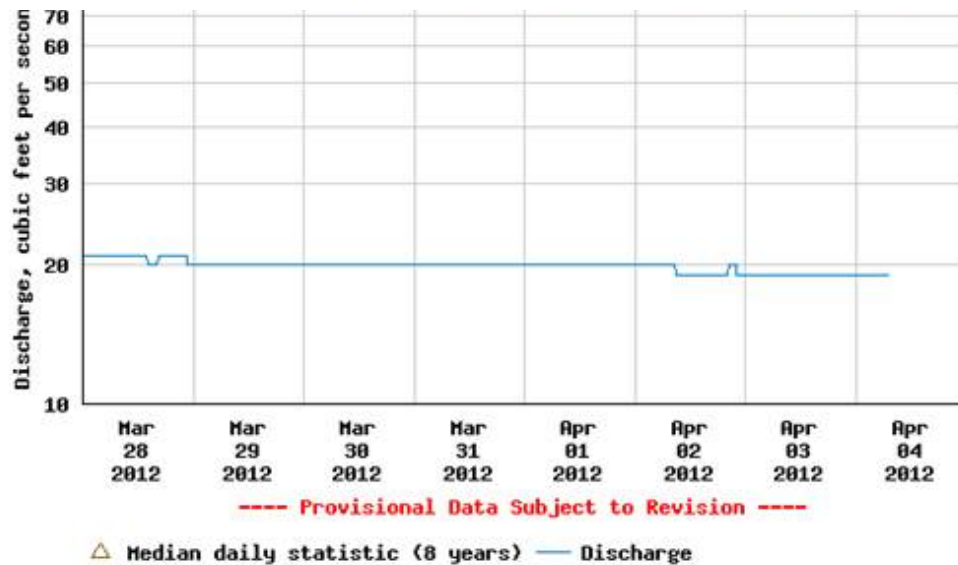
Drake Ranch hopes some of Mr. Robert L. Knight's suggestions can be implemented by Southwest FL Water Mgt. District.

Thank you,

Holland Drake
Drake Ranch
1224 SE Ft. King St.
Ocala, FL 34471
holland@drakeconstructionservices.com
Office: 352-867-8101
Cell: 352-266-9591

PS. Gum Slough's water monitor today reads:





From: Michael Lancaster [mailto:mikelanlan@yahoo.com]

Sent: Wednesday, April 04, 2012 7:53 AM

To: brooke adams; bob drake; Ann Louise Drake; Holland Drake; Ann Louise Drake MacKay Drake; Rex Farrior; laura humbel; bo botkin lancaster; David - Belleview High School Lancaster; lisa lancaster

Subject: This is tonight, I'm planning on attending. Gum Springs MFL Workshop

--- On Wed, 4/4/12, Mark & Mary Emery <info@markemeryfilms.com> wrote:

From: Mark & Mary Emery <info@markemeryfilms.com>

Subject: FW: Gum Springs MFL Workshop

To: "Michael Lancaster" <mikelanlan@yahoo.com>

Date: Wednesday, April 4, 2012, 7:46 AM

All

Please see the email thread below. The District intends to accept public comment but no presentations of data. Please come prepared to make comments and requests to the District.

Here are some ideas to consider while developing your comments:

-
- There are only 8 years of flow data for Gum Slough to serve as a basis for this MFL. Those data were largely collected during a period of declining rainfall totals and are not likely to be representative of long-term flows in

this system. The requested 9% flow reduction establishes a new target average flow rate that is less than it would be if we had a longer period with more normal (higher) flow records.

-
-
- The uppermost springs in the Gum Slough Spring System stopped flowing several times during this recent period of flow data. Based on the longest period of eyewitness observations this did not occur in the more distant past. This recommended MFL will exacerbate low flows and extend no-flow conditions since there is no way to cut off pumping during drought periods.
-
-
- Declining flows coupled with increasing fertilizer and wastewater nitrogen loads in the springshed typically result in increasing pollutant (nitrate) concentrations in the groundwater and springs. The District does not adequately consider the effects of additional flow reductions on nitrate levels in Gum Slough that are already more than 25 times the background and nearly 4 times higher than DEP's proposed standard for springs.
-
-
- Minimum recorded flows in Gum Slough at the downstream gauge are 24 cfs. The draft MFL allows an average flow reduction of about 9 cfs (9% of 98 cfs, the average flow over the past 8 years). This proposed flow reduction is 38% of the low flow for this spring run, well past the point of the District's definition of "significant harm".
-
-
- My own studies of Gum Slough and similar spring runs indicates that the primary productivity (the amount of food available for the aquatic fauna) is directly related to the flow and that there is no apparent threshold where an allowable flow reduction will not result in ecological harm. To me this means that "significant" harm occurs as soon as there is measurable flow reduction. Thus a much lower standard than 15% reduction in habitat appears to be more appropriate to prevent "significant harm". Based on my accumulating knowledge about how springs work, I would recommend no more than a 5% flow reduction to result in *de minimus* harm.
-
-
-
- The District estimates with their groundwater model that average flows have already been reduced by 4% from historic levels. I will recommend that there is considerable uncertainty in this estimate and that to "Do No Harm" they should not allow any additional permitted withdrawals in this springshed until they have at least 20 years of flow records and a better understanding of what is normal and what is impaired.
-
-
- My recommendations to the District: no additional flow reductions

allowed by this MFL; continue to collect flow data and set a firm date to revisit the MFL in no more than 10 years

If you have the time and energy, please read through the District' reports and the PEER review document. I had the impression that the PEER reviewers didn't really agree that the MFL for Gum Slough is based on sound science.

Bob

Robert L. Knight, Ph.D.
Director
Howard T. Odum Florida Springs Institute
5302 NW 156 Avenue
Gainesville, Florida 32653
www.floridaspringsinstitute.org
352-538-6620 cell
386-462-1003 office

From: Gary E. Williams [<mailto:Gary.Williams@swfwmd.state.fl.us>]
Sent: Monday, March 26, 2012 2:41 PM
To: Bob Knight
Cc: Ron Basso
Subject: Gum Springs MFL Workshop

Hi Bob,
The Gum Slough MFL workshop is going to be conducted as a District informational workshop with time set aside for public input. I will be giving a presentation on the MFL process and Gum MFL, then Ron Basso will give a presentation on the groundwater modeling tools that we use. Both of these presentations will be similar to the ones that were given at the first workshop. After our presentations are finished, there will be time for both question & answers and for public comment, but not for other presentations. We want to give everyone who wishes to provide public comments the time to do so. If time allows, I will be happy to give you some latitude in the length of your comment period.
Thanks,
Gary

Gary E. Williams, PhD
Natural Systems and Restoration Bureau
Southwest Florida Water Management District
2379 Broad Street
Brooksville, Florida 34604
Ph. (352) 796-7211 x4286

From: Bob Knight [<mailto:bknight@wetlandsolutionsinc.com>]
Sent: Monday, March 26, 2012 10:33 AM
To: Gary E. Williams
Subject: RE: Gum Springs Flow Diversion Study Report - Final

Gary

I would like to request an opportunity to make a presentation at next

week's Gum Slough MFL meeting. I would like to have up to 30 minutes if possible. Will someone from the District be making a presentation? Who will that be and what will it cover?

Thanks,

Bob

From: Gary E. Williams [<mailto:Gary.Williams@swfwmd.state.fl.us>]

Sent: Thursday, March 22, 2012 10:08 AM

To: Bob Knight

Subject: RE: Gum Springs Flow Diversion Study Report - Final

Hi Bob,

The MFL is still in draft form and the plan is to take it to the board after Chassahowitzka and Homosassa have been finalized. No changes have been made to the MFL report as of yet. A primary purpose of the upcoming meeting is to get additional public input. This is likely to be, but not definitely, the last public meeting prior to finalizing the Gum Springs MFL.

Best,

Gary

Gary E. Williams, PhD

Natural Systems and Restoration Bureau
Southwest Florida Water Management District
2379 Broad Street
Brooksville, Florida 34604
Ph. (352) 796-7211 x4286

From: Bob Knight [<mailto:bknight@wetlandsolutionsinc.com>]

Sent: Thursday, March 22, 2012 9:57 AM

To: Gary E. Williams

Cc: 'Scott Knight'

Subject: RE: Gum Springs Flow Diversion Study Report - Final

Gary

Thanks. I will distribute the Gum Slough MFL public meeting announcement. Do you have any other information about the status of the draft MFL? Were there any changes made? What is the proposed schedule for taking this to the Governing Board? Is this the final public meeting? Is there still opportunity for public input?

If I could put some additional information in the announcement that might be helpful for folks who have an interest in attending.

Thanks,

Bob

From: [Holland Drake](#)
To: [Gary E. Williams](#)
Cc: [Jason Hood](#); ["Bob Knight"](#); ["2buntings"](#); [the felburn foundation@yahoo.com](#); ["Mark & Mary Emery"](#); ["Judy Smith"](#); ["Lars Andersen"](#); ["Lisa at Aqua Pure Laboratory"](#); [LESrri3@aol.com](#); ["Linda K. Bystrak"](#); ["Carol Lippincott"](#); ["Merrillee Malwitz-Jipson"](#); ["brad"](#); ["Sean King"](#); ["Karen Chadwick"](#); [ahlers.karen@gmail.com](#); ["Jim Stevenson"](#); ["Cris Costello"](#); ["David Wilson"](#); ["Peter Butt"](#); ["Todd Kincaid"](#); ["Emma Knight"](#); ["Michael Lancaster"](#); ["brooke adams"](#); ["bob drake"](#); ["Ann Louise Drake"](#); ["Rex Farrior"](#); ["laura humbel"](#); ["bo botkin lancaster"](#); ["David - Belleview High School Lancaster"](#); ["lisa lancaster"](#); [info@markemeryfilms.com](#); [Gary E. Williams](#); [BKnight@FloridaSpringsInstitute.org](#); [trustendrake@embargmail.com](#); ["Steven Redrick"](#); [MacKay Drake](#); [mdrake@drakeexec.com](#); [Preston Farrior](#); ["Guy"](#); ["Tom"](#); ["Mark Brenner"](#)
Subject: Save the Manatee Club's recommendations for adopting the MFL for Gum Slough Springs
Date: Wednesday, April 11, 2012 11:48:00 AM
Attachments: [SMC Gum Slough Springs Comment Letter 4 5 12.pdf](#)

FROM: DRAKE RANCH, Dunnellon, FL., A landowner along Gum Slough Springs

TO:

Gary E. Williams, PhD
Natural Systems and Restoration Bureau
Southwest Florida Water Management District
2379 Broad Street
Brooksville, Florida 34604
Ph. (352) 796-7211 x4286

Dear Gary,

Drake Ranch supports Katie Tripp's, Ph. D. (Save the Manatee Club) recommendation to adopt an MFL for Gum Slough Springs which allows a 0% reduction in flow and continued research (See Katie's letter attached). In over seventy five (75) years Owners of Drake Ranch have never witnessed this spring run in such poor shape. We further agree with Katie's assessment that Gum Slough Springs appears to be a prime candidate for a recovery strategy.

We thank you for all your help in trying to protect Gum Slough Springs.

Sincerely,

Holland Drake
Drake Ranch Partner
1224 SE Ft. King St.
Ocala, FL 34471
holland@drakeconstructionservices.com
Office: 352-867-8101
Cell: 352-266-9591