# APPENDIX D: LETTER FROM FISH AND WILDLIFE CONSERVATION COMMISSION (FWC)

Florida Fish and Wildlife Conservation Commission

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March 3, 2017

Andrew B. Sutherland, Ph.D.
MFLs Technical Program Manager
Bureau of Resource Evaluation and Modeling
St. Johns River Water Management District
P.O. Box 1429
Palatka, FL 32178-1429
asutherl@sjrwmd.com

RE: Silver Glen Springs Minimum Flows and Levels, Marion County

Dear Dr. Sutherland:

We appreciate the presentation that the St. Johns River Water Management District (SJRWMD) provided on February 16, 2017, on the approach and modeling that is being taken regarding the development of the Silver Glen Springs Minimum Flows and Levels (MFL).

During the discussion, SJRWMD staff requested that the Florida Fish and Wildlife Conservation Commission (FWC) staff provide wildlife-related technical information that would assist their determination of "at what percent flow reduction does significant harm to manatees occur?" and information on usage of the spring-run by other species that may also need to be considered in the development of the MFL.

Maintaining adequate warm water for manatees has been identified by SJRWMD as the guiding parameter for determining the Silver Glen Springs MFL. Silver Glen Springs is a secondary warm water site and a critical component of the network of natural warm water sites utilized by hundreds of manatees each winter in north-central Florida. SJRWMD modeling efforts indicate that reductions in flow could affect this wintertime manatee thermal refuge, located in the St. Johns River system. We understand that only limited data collection occurred near the St. Johns River portion of the spring-run (Area 2) resulting in a less than desirable amount of data used in the modeling efforts. We recommend that additional data collection occur in the vicinity of the St. Johns River portion of the spring run (Area 2) due to its consistent use by manatees. The SJRWMD modeling and the 2035 pumping projections indicated a potential 0.4 cfs change in flow from 2010 conditions. We have no indication that the proposed 0.4 cfs change in flow will affect the current extent of warm water habitat. The 5% change in flow also modeled would likely affect the amount of warm water habitat available for manatees; however, the extent of the affect is unclear based on the information currently available. FWC supports the establishment of MFLs to ensure that warm water habitat that is accessible to manatees is protected.

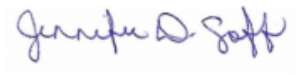
The St. Johns River is the southernmost extent of the Atlantic striped bass (*Morone saxatilis*) range. Silver Glen Springs is a primary summer thermal refuge habitat which holds one of the largest aggregations during the summer and fall months. Spring-flow reductions during the summer months that limit passage to this thermal refuge may affect the Atlantic striped bass population in the St. John River. The current SJRWMD analysis

only models water temperature during the winter months. We recommend incorporation of water temperatures during the summer and fall months during future modeling efforts.

Additionally, bluenose shiner (*Pteronotropis welaka*, State Threatened) has disjunct populations in the Florida panhandle and the St. Johns River drainage, which may include Silver Glen Springs. Bluenose shiners from the St. Johns River population typically occupy spring-fed rivers and spring runs that contain dense emergent and submersed aquatic vegetation. The bluenose shiner Species Action Plan lists several threats pertinent to the Silver Glen Springs MFL including changes in water quality and quantity, and habitat alteration. FWC staff supports the establishment of MFLs that is protective of water quality and quantity that supports habitat for this species.

We appreciate the opportunity to provide you technical assistance as part of the development of the Silver Glen Springs MFL. We look forward to reviewing the draft Silver Glen Springs MFL document when it is completed. If you need any further assistance, please contact Jane Chabre either by phone at (850) 410-5367 or at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions regarding the content of this letter, please contact Ted Hoehn at (850) 488-8792) or by email at Ted.Hoehn@MyFWC.com.

Sincerely,



Jennifer D. Goff
Land Use Planning Program Administrator
Office of Conservation Planning Services

jdg/th
ENV 1-12-2
Silver Glen Springs MFL_32549_030317

cc: Mike Register, SJRWMD, MREGISTE@sjrwmd.com