Exhibit A

Memorandum

Date: **4/8/2026**

Project No.: **204792**

To: **Eric DeHaven, Executive Director, Polk Regional Water Cooperative**

From: **Tony Janicki, PhD, Environmental Science Associates**
A. Dale Helms, PE, Carollo Engineers

Subject: **Review Comments on the Proposed Minimum Flows for the Upper Peace River from Bartow to Zolfo Springs, Florida**

1 Executive Summary

This technical analysis identifies ecological and methodological deficiencies in the Southwest Florida Water Management District's ("District") November 2025 draft report entitled *A Reevaluation of Minimum Flows for the Upper Peace River from Bartow to Zolfo Springs, Florida* (the "Draft Report"). The Draft Report proposes to replace the existing minimum flows adopted in 2006 with a four-block flow regime (**Table 1**) that includes new high-flow restrictions (Blocks 3A and 3B) designed to protect floodplain inundation. These new high-flow restrictions will substantially reduce the quantity of water available for consumptive use by the Polk Regional Water Cooperative ("Cooperative") from the Upper Peace River.

Table 1 Proposed Upper Peace River Minimum Flows and Allowable Flow Reductions

River Segment	Index Gage Name (Site ID)	Flow Block	Flow Range	Maximum Allowable Reduction [a]	Minimum Flow [a]
Upper	Bartow (02294650)	1	≤ 30 cfs	0%	100% [b]
		2	> 30 cfs and ≤ 71 cfs	12%	30 cfs or 88% [c]
		3A	> 71 cfs and ≤ 483 cfs	15%	85%
		3B	> 483 cfs	7%	93%
Middle	Fort Meade (02294898)	1	≤ 21 cfs	0%	100% [b]
		2	> 21 cfs and ≤ 120 cfs	12%	21 cfs or 88% [c]
		3A	> 120 cfs and ≤ 529 cfs	10%	90%
		3B	> 529 cfs	7%	93%
Lower	Zolfo Springs (02295637)	1	≤ 40 cfs	0%	100% [b]
		2	> 40 cfs and ≤ 274 cfs	13%	40 cfs or 87% [c]
		3A	> 274 cfs and ≤ 1,047 cfs	9%	91%
		3B	> 1,047 cfs	7%	93%

Notes:
[a] Based on previous day baseline flow.
[b] A 95% annual exceedance is proposed to account for uncertainties related to annual rainfall variations, provisional USGS data, sinkhole losses, Lake Hancock water storage capacity, and structure maintenance, etc.
[c] Whichever is greater.

The Cooperative's water supply operations will depend on withdrawing water from the Upper Peace River at a future intake station located near Bowling Green during high-flow periods and storing it in a reservoir for use throughout the year, including during low-flow periods when the Cooperative is unable to withdraw. The proposed Block 3A and 3B restrictions at the Zolfo Springs index gage would limit the Cooperative to withdrawing no more than 7-9% of the flow during these critical high-flow periods, reducing the Cooperative's potentially available long-term average available withdrawals from approximately 28 million gallons per day (mgd) to approximately 17-18 mgd—a reduction of approximately 36-39%.

The Florida Water Resource Implementation Rule (Rule 62-40.473, Florida Administrative Code) for establishment of Minimum Flows and Levels (MFLs), requires that "…consideration shall be given to natural seasonal fluctuations in water flows or levels, nonconsumptive uses, and environmental values associated with coastal, estuarine, riverine, spring, aquatic and wetlands ecology, including:

- Recreation in and on the water;
- Fish and wildlife habitats and the passage of fish;
- Estuarine resources;
- Transfer of detrital material;
- Maintenance of freshwater storage and supply;
- Aesthetic and scenic attributes;
- Filtration and absorption of nutrients and other pollutants;
- Sediment loads;
- Water quality; and
- Navigation."

The District's MFL approach for the Upper Peace River included establishment of a baseline flow condition that provided the basis for comparison to various potential MFL flow regimes. To account for seasonal variability of the effects of flow changes on critical river characteristics, flow-based blocks were defined. A HEC-RAS hydraulic model of the Upper Peace River was established to provide quantitative estimates of the relationships between streamflow and various metrics that represent the MFL water resource values (WRVs).

A number of potential concerns associated with the proposed revisions to the current Upper Peace River MFLs have been identified including:

- Choice of MFL floodplain metric—inundated floodplain area
- Non-linear ecological responses to changes in flows
- Percent-of-flow methodology
- Groundwater component of MFL determination

Identified technical deficiencies associated with these issues are discussed herein. The District should consider these comments and revise the Draft Report so that the proposed Upper Peace River MFLs are grounded in sound science and appropriately balance the statutory objectives of ecological protection and the provision of water for reasonable-beneficial use.

2 MFL Approaches to Address Ecological and Water Resource Values

The following generally describes the approaches used by the District for the evaluation of each potential WRV.

2.1 Recreation in and on the Water

Using the HEC-RAS model output, the Recreation WRV was evaluated by assessing water depths and analyzing potential changes in floodplain inundation. Water levels were reviewed to ensure protection of the floodplain and instream fish and invertebrate habitats.

2.2 Navigation

The navigation criterion is defined as the flow corresponding to a water depth of 0.5 ft (0.15 m), consistent with several previous minimum flow evaluations conducted for the Lower Santa Fe River (HSW, 2021), Charlie Creek (Deak et al., 2023), Horse Creek (Ghile et al., 2023), and Little Manatee River (Holzwart et al., 2023). Given the availability of existing boat launch facilities and docks along the river, the waterway is not expected to support commercial and large-scale recreational boating, aside from canoeing or kayaking.

2.3 Water Quality

The District analyzed 14 water quality parameters. These analyses included assessment of temporal trends in these parameters. Spatial variability was also examined in relation to variation in river flows. The potential impacts of river flows on both temporal and spatial variability were also examined. As part of the minimum flow evaluation, The inundation of floodplain areas can largely contribute to both temporal and spatial variability. The results from these analyses indicate that the recommended minimum flows for the Upper Peace River are not expected to negatively affect water quality or impair the water designated use of the water body.

2.4 Sediment Loads

Variation in sediment loads (the total quantity of sediment transported by a river, including both suspended particles and bedload) can significantly alter stream habitats for fishes and macroinvertebrates. Sediment loads are largely affected by river flow, channel morphology, and sediment size. The relative change between the baseline and minimum flow conditions provides a useful measure of the potential effects of the recommended minimum flows on sediment loads. The District concluded that the recommended minimum flows will not significantly reduce sediment loads in the Upper Peace River.

2.5 Filtration and Absorption of Nutrients and Other Pollutants

The relationships between the Filtration and Absorption of Nutrients and Other Pollutants WRV and river flow were assessed by the District. As was observed for several other WRVs, variation in river flows can significantly affect this environmental value. This environmental value is also linked to other WRVs, including Recreation in and on the Water, Fish and Wildlife and the Passage of Fish, Transfer of Detrital Material, Sediment Loads, and Water Quality. The District assessed this environmental value by evaluating system bathymetry, floodplain inundation, and instream habitats. This WRV is perhaps most closely linked to the inundation of floodplain areas.

2.6 Aesthetic and Scenic Attributes

The District concluded that the aesthetic and scenic attributes of the Upper Peace River are closely intertwined with other WRVs (i.e., Recreation In and on the Water, Fish and Wildlife and the Passage of Fish, Transfer of Detrital Material, Filtration and Absorption of Nutrients and Other Pollutants, Sediment Loads, Water Quality, and

Navigation). Therefore, minimum flows that are protective of these other WRVs will also protect the river' s aesthetic and scenic attributes.

2.7 Estuarine Resources

The District noted that the Upper Peace River flows through the middle and lower segments of the Peace River before ultimately emptying into Charlotte Habor estuary. The Upper Peace River is not directly connected to estuarine resources. Therefore, the District did not consider this WRV directly relevant for the development of minimum flows for the Upper Peace River.

2.8 Maintenance of Freshwater Storage and Supply

While the maintenance of freshwater storage and supply is protected through the implementation of the District's Water Use Permitting and Environmental Resource Permitting Programs, the established MFL will provide the regulatory basis for its water supply.

2.9 Transfer of Detrital Material Transfer

The District considered the Transfer of Detrital Material WRV (i.e., the movement of loose organic material, debris, and decomposing biota from floodplain overbanks into the main channel) for MFL development of recommended minimum flows for the Upper Peace River. Maintenance of the floodplain habitats in the Upper Peace River is essential to detrital transfer processes, including serving as sources or sinks, and conduits for organic matter production, export, and utilization. Of particular importance is the inundation of floodplain areas at the proposed Block 3A and 3B MFLs.

2.10 Fish and Wildlife Habitat and the Passage of Fish

To support the Fish and Wildlife Habitat and the Passage of Fish WRV, the District defined an MFL that protected the full range of flow conditions. The protection of fish passage is ensured by the low flow conditions that provide for an adequate water depth to allow passage. The District applied the System for Environmental Flows Analysis (SEFA) to define the flows necessary to sustain instream habitats for fish and wildlife. Woody habitat inundation analysis was performed to ensure adequate inundation of habitats for microbial colonization and subsequent probable use by other organisms. The higher MFL block flows and water levels were also evaluated to ensure the protection of critical floodplain habitats for fish and wildlife.

3 Ecological Issues Associated with Proposed Revisions to Current MFLs

A central assumption of the proposed MFLs is that the Block 3A and 3B flow restrictions are necessary to protect the area of Upper Peace River floodplains, and that maintaining a minimum floodplain inundation area is necessary to prevent "significant harm." This assumption rests on the choice of the most appropriate floodplain characteristic, which in this case is area of floodplain inundation. A number of MFLs previously established by the state's water management districts applied this approach. Is there any evidence that supports the assumption that ecological function varies with the area of floodplain that is inundated?

3.1 Choice of MFL Floodplain Metric: Inundated Floodplain Area

Recent research, for example a study authored by Cliff Neubauer and others of the St. Johns River Water Management District (Neubauer et al., 2008), has concluded that inundation frequency, duration, and timing are more ecologically important than total inundation area. Similar results were reported by Scott et al. (2019). The District should provide further justification to support the choice of inundated area as the best metric of floodplain health and productivity.

3.2 Non-Linear Ecological Responses

Floodplain ecosystems typically exhibit threshold effects and non-linear responses to flow changes, not the linear relationship assumed by the 85% area proposed threshold. D'Amario et al. (2019), published in *Scientific Reports*, found that nonlinear ecological responses occur in "half of all analyses, with some evidence of multiple breakpoints." Dodds et al. (2010) established the theoretical framework for understanding thresholds in freshwater systems, defining a threshold as a point where "the system responds rapidly to a relatively small change in a driver." The existence of ecological thresholds means that a 15% reduction in floodplain area may fall well within the range of ecological resilience, producing no detectable harm.

3.3 Percent-of-Flow Methodology

The District employs a percent-of-flow methodology to establish the Block 3A and 3B minimum flows. The District has a long history of applying this methodology particularly in both MFL development and water use permitting. However, a comprehensive meta-analysis published in *Water Supply* (Gebreegziabher et al., 2023) characterized percent-of-flow methods as "simplistic hydrological approaches with low data requirements that address only physical aspects and provide simplistic answers with little or no ecological relevance." Some of the environmental community has shifted toward "functional flows" approaches that identify specific ecological functions (fish migration, nutrient cycling, floodplain connectivity, sediment transport) and evaluate whether specific flow reductions actually compromise those functions. The California Environmental Flows Framework, for example, identifies five discrete components of the annual hydrograph that support key biophysical processes, rather than imposing fixed percentage reductions. Yarnell et al. (2020) provide a rigorous methodology for selecting ecologically relevant flow metrics tied to specific ecological outcomes, representing the current state of the science. If possible, the District should consider this criticism.

4 Groundwater Component of MFL Determination

4.1 Development of Groundwater Adjustment Rates

A central component of the District's proposed MFL methodology is the estimation of baseline flows—i.e., what river flows would have been without the influence of regional groundwater withdrawals. To derive these baseline flows, the District used the Peace River Integrated Model, Version 2 (PRIM2), a coupled groundwater/surface water model. The PRIM2 model was run for two scenarios covering the years 2003 to 2018: one using existing (100%) groundwater pumpage rates, and one using a 50% reduction in groundwater pumpage. The monthly differences in simulated streamflow between these two scenarios were then doubled to estimate the streamflow changes attributable to the full elimination of groundwater withdrawals. These estimated monthly streamflow differences—referred to as groundwater impact adjustment rates—were then added to actual historical gaged streamflows at each of the three index gages (Bartow, Fort Meade, and Zolfo Springs) to produce estimated baseline daily flows for MFL development.

Because the PRIM2 model was only run for the 16-year period from 2003 to 2018, the District needed to extend the adjustment factors to cover the full desired baseline period of 1975 to 2022. To accomplish this, yearly adjustment rates were determined by dividing the estimated total groundwater use in each of the baseline years by the average groundwater use for the 16-year PRIM2 modeling period. These yearly adjustments were then applied to the average monthly adjustment factors for the PRIM2 modeling period. The resulting final factors were applied to the daily gaged record of the river to estimate daily baseline flows for the 1975–2022 period (Draft Report, Section 5.4).

The resulting monthly adjustment rates, as reported in Table 5-6 of the Draft Report, vary significantly by month and by gage location. At Bartow, adjustments range from –0.62 cfs (May) to +32.73 cfs (September), with an annual average of +13.41 cfs. At Fort Meade, adjustments range from +4.31 cfs (May) to +34.78 cfs (September), with an annual average of +17.14 cfs. At Zolfo Springs, adjustments are predominantly negative, ranging from –25.18 cfs (June) to +12.22 cfs (October), with an annual average of –6.54 cfs. These adjustment factors are central to the District's determination of both baseline flows and MFL compliance status.

4.2 Application of Monthly Adjustment Rates to Determine Available Water

The District's proposed method for implementing the MFLs for compliance purposes uses the monthly groundwater adjustment rates to convert daily gaged flows into estimated daily baseline flows. Specifically, on any given day, the monthly adjustment rate for that calendar month is added to (or subtracted from) the observed gaged flow at each index gage to compute the estimated baseline flow. The proposed percent-of-flow diversion limits (by block) are then applied to these adjusted baseline flows to determine the allowable daily diversions. This methodology is described in the District's March 27, 2026 presentation (Ghile, 2026) and would also serve as the basis for determining permissible limits for new surface water withdrawals from the Upper Peace system upstream of Zolfo Springs.

4.3 Impracticality of Monthly Adjustment Rates

Applying the groundwater impact adjustment rates on a monthly basis creates operationally problematic and scientifically questionable transitions at calendar month boundaries. Because each adjustment rate changes discretely at the turn of each month, the estimated baseline flow—and therefore the allowable diversion—can change abruptly from one day to the next even though the actual river flow may not change appreciably. For example, if the river is experiencing nearly the same gaged flow on the 31st of one month as on the 1st of the following month, the monthly adjustment factor applied to that flow will differ solely because of the calendar date. This could result in a situation where a water user is permitted to withdraw water from the river on the 31st but is no longer permitted to withdraw on the 1st, despite the streamflow being essentially identical on both days. From

an operational standpoint, particularly for a surface water supply project that depends on consistent withdrawal opportunities during high-flow periods, this approach is impractical and perhaps unnecessarily restrictive. The Cooperative's proposed withdrawal from the Upper Peace River near Bowling Green would require consistent and predictable operational rules, and tying withdrawal eligibility to a monthly adjustment rate that shifts arbitrarily at calendar boundaries undermines that objective.

4.4 Ecological Unsoundness of Monthly Adjustment Rates

Beyond the operational difficulties, the use of monthly groundwater adjustment rates for MFL compliance is ecologically unsound. Groundwater interactions with the Upper Peace River do not change discretely at the boundary of each calendar month. Groundwater discharge to, and recharge from, a river is a continuous process governed by the hydraulic gradient between the aquifer and the stream, which responds to regional pumping patterns, seasonal rainfall, and aquifer storage on timescales that do not align with the calendar. As Flannery (2026) has observed, the Upper Peace River is a highly complex system for modeling groundwater interactions with streamflow, in large part because of extensive physical alterations to its watershed—particularly widespread phosphate mining, which currently accounts for approximately 25% of the upper river basin. Mined lands in close proximity to the river, including large areas of clay settling ponds, have very little recharge to the Floridan aquifer and disrupt localized groundwater flow to the river (Flannery, 2026). There have also been large historical changes in groundwater use in the upper river basin, much of which occurred when water use records were not nearly as complete as today.

From an ecological perspective, the organisms, habitats, and biogeochemical processes that the MFLs are designed to protect do not respond to arbitrary monthly categorizations of groundwater influence. Fish passage, floodplain inundation, sediment transport, nutrient cycling, and detrital transfer are all driven by actual flow conditions in the river at any given time—not by the calendar month in which that flow occurs. A fish moving through a reach on the last day of one month experiences the same hydraulic conditions as on the first day of the next month if the flow is the same. Similarly, floodplain connectivity and the biogeochemical processes it supports are governed by the magnitude and duration of flows, not by monthly administrative boundaries. Applying different groundwater adjustments to identical river conditions solely because of a calendar date change introduces an artificial discontinuity that has no ecological basis and no relationship to the continuous physical processes occurring in the river system.

The ecological deficiency of the monthly adjustment factor approach is compounded by the fact that each monthly rate adjustment is applied as a fixed flow quantity regardless of the rate of flow in the river. As Flannery (2026) has demonstrated, because the adjustment factor for a given month does not vary with the flow rate, the resulting determination of allowable withdrawals produces anomalous seasonal patterns that bear no rational relationship to the ecological needs of the river system. For example, using the District's methodology at the Fort Meade gage, at a gaged flow of 150 cfs in June, an allowable net withdrawal of 9.6 cfs can be calculated, yet at that same 150 cfs flow rate no water can be withdrawn at all during August, September, October, November, or December—months that are generally less ecologically sensitive than the early summer period when fish spawning and recruitment are active. In September, no water can be withdrawn until gaged flows reach 314 cfs or greater. These results are ecologically counterintuitive: the monthly adjustment rates effectively permit withdrawals during ecologically critical low-flow periods in some months while prohibiting withdrawals during less sensitive high-flow periods in other months, solely because of how the fixed monthly adjustment interacts with the rate of flow.

This fundamental mismatch between the adjustment factor methodology and the ecological realities of the river undermines the capacity of the proposed MFLs to fulfill their statutory mandate of preventing "significant harm" to the water resources and ecology of the Upper Peace River. The purpose of an MFL is to ensure that withdrawals do

not cause unacceptable ecological degradation; yet a methodology that produces arbitrary seasonal variations in water availability—unrelated to actual ecological sensitivity or the magnitude of flow—cannot reliably achieve that objective. Flannery (2026) has recommended that the District examine adjustment rates based directly on the rate of flow, possibly incorporating a seasonal component, which would more accurately reflect the hydrologic and ecological characteristics of the river and provide a more scientifically defensible basis for protecting the system from significant harm.

4.5 Alternative Approach Using a Single Groundwater Adjustment Rate

In place of the twelve monthly adjustment factors, the District could also consider applying a single average annual groundwater impact adjustment rate at each MFL index gage location. The long-term average values from the PRIM2 model, as reported in the Draft MFL Report Table 5-6, provide a straightforward basis for such an approach: +13.4 cfs for Bartow, +17.1 cfs for Fort Meade, and –6.5 cfs for Zolfo Springs. Applying a single adjustment rate at each gage would eliminate the artificial monthly discontinuities that create operationally impractical and ecologically meaningless transitions in the determination of allowable withdrawals. For MFL implementation and compliance, substituting a single annual average groundwater adjustment rate for the monthly rates would have a negligible effect on the estimated long-term water availability but would provide substantial operational and ecological advantages.

A single annual adjustment rate would make practical operation of a surface water supply project simpler and more predictable, while still being protective of the water resources and ecology of the system. The single rate would also better reflect the underlying reality that groundwater interactions with the river are continuous processes that are more accurately characterized by long-term averages than by month-to-month fluctuations in a model output. It is recommended that the District consider adopting this approach for the operational implementation and ongoing compliance of the proposed MFLs.

5 Conclusions

The Upper Peace River is both an ecologically significant waterbody and a vital potential source of water supply for the citizens of Polk County. The Cooperative recognizes that the District has a statutory obligation to establish MFLs that prevent significant harm to the water resources and ecology of the river. At the same time, Section 373.042, Florida Statutes, requires that the establishment of minimum flows account for the needs of both the natural system and reasonable-beneficial uses of water, including public water supply.

This analysis has identified a number of ecological, methodological, and technical deficiencies in the Draft Report that, if left unaddressed, will result in MFLs that are unnecessarily restrictive without providing a corresponding ecological benefit—thereby depriving the citizens of Polk County of a critical water supply resource without adequate scientific justification. The District should revise the Draft Report to address the following concerns.

Choice of Floodplain Metric. The Draft Report uses inundated floodplain area as the primary ecological metric for establishing the Block 3A and 3B flow restrictions. Recent peer-reviewed research indicates that inundation frequency, duration, and timing are more ecologically important than total inundation area. The District should provide additional justification for its reliance on inundated area or, alternatively, incorporate frequency- and duration-based metrics that more accurately reflect floodplain ecological function.

Non-Linear Ecological Reponses and the 15% Habitat Loss Threshold. The Draft Report assumes that maintaining at least 85% of baseline floodplain inundation area is necessary to prevent significant harm. However, floodplain ecosystems exhibit threshold effects and non-linear responses to flow changes, not the linear relationship implicit in a fixed percentage standard. The District should evaluate whether a 15% reduction in inundated area actually produces measurable ecological harm or falls within the range of ecological resilience, and should justify the selected threshold with site-specific data rather than relying on a generalized assumption.

Percent-of-Flow Methodology. The District applies a percent-of-flow methodology to establish the Block 3A and 3B minimum flows. While the District has a long and defensible history of using this approach, the scientific community has increasingly recognized the limitations of percent-of-flow methods for assessing ecological impacts. The District should consider supplementing or refining its approach by evaluating whether specific flow reductions actually compromise identifiable ecological functions—such as fish migration, floodplain connectivity, and sediment transport—rather than relying exclusively on a fixed percentage reduction.

Groundwater Adjustment Rate Methodology. The District's use of monthly-averaged groundwater adjustment rates derived from the PRIM2 model to estimate baseline flows raises three distinct concerns. First, the monthly adjustment rates create operationally impractical discontinuities at calendar month boundaries, where the allowable withdrawal can change abruptly from one day to the next despite no change in actual river flow. Second, the monthly adjustments are ecologically unsound because groundwater interactions with the river are continuous processes that do not follow the calendar, and the organisms and habitats that the MFL is designed to protect respond to actual flow conditions, not to administrative monthly categories. Third, because each monthly adjustment rate is a fixed quantity applied regardless of the actual rate of flow, the methodology produces anomalous seasonal patterns in water availability that bear no rational relationship to the ecological sensitivity of the river at different flow magnitudes—undermining the capacity of the proposed MFLs to fulfill their statutory mandate of preventing significant harm. The District could consider replacing the twelve monthly adjustment factors with a single annual average adjustment rate at each gage, as doing so would produce a negligible

difference in long-term water availability while eliminating the operational and ecological deficiencies of the monthly approach. Alternatively, the District could also examine whether adjustment rates based directly on the rate of flow would more accurately reflect the hydrologic and ecological characteristics of the river.

The Cooperative is committed to working constructively with the District to develop minimum flows that are scientifically defensible, ecologically protective, and operationally workable. The Upper Peace River can and should serve both ecological and water supply functions. The issues identified in this analysis are not insurmountable, but they require the District to revise the Draft Report so that the proposed MFLs are grounded in sound science, reflect the severely altered condition of the upper river watershed, and appropriately balance the statutory objectives of environmental protection and the provision of water for the reasonable-beneficial use of the citizens of Polk County.

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