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April 2, 2012

Florida
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Mr. Hans G. Tanzler III, Executive Director
St. Johns River Water Management District
P.O. Box 1429
Palatka, FL 32178-1429

RE: CUP Application #2-083-129419-1 Adena Springs Ranch

Dear Mr. Tanzler,

The Sierra Club Florida has deep concerns regarding the pending consumptive Use Permit application for Adena Springs Ranch and the significant negative impacts this project could have on the water quality and quantity of Silver Springs, the Silver River and the Ocklawaha River Aquatic Preserve.

A 50-year retrospective study of Silver Springs revealed the following:

- NO₃-N has increased by 176%
- Water clarity has decreased
- Nighttime dissolved oxygen has declined by about 19%
- Total plant and algal biomass increased by 88%
- Ecosystem productivity declined by 27%
- Insect productivity declined by 72%
- Fish biomass declined by 96%
- Silver River flows have declined by about 50% since 1965 - a reduction of 480 cfs

The Adena Springs Ranch property is located in a high risk area for these premier ecological resources:

- It is very near the Ocklawaha River Aquatic Preserve
- It is within the Silver Springs Groundwater Basin
- It is in or near the highest recharge area for Silver Springs

The Adena Springs Ranch CUP, if granted, would allow for 13 MGD to be pumped from within the springshed of Silver Springs. The size of this withdrawal is totally unacceptable given the well documented ecosystem declines and risk factors mentioned above.

Also of concern is the fact that the District's groundwater flow models apparently do not accurately predict the observed declining flows at Silver Springs. In addition, research to set a Minimum Flow and Level (MFL) for Silver Springs is still being conducted by both the SJRWMD and the SWFWMD using slightly different methodologies. We believe that a CUP of this size should be denied until such time that the MFL studies of both water management districts are complete and a MFL is determined for Silver Springs.

We urge you to follow Florida law and protect the water quality and quantity of Silver Springs as well as the Silver River and Ocklawaha River - both Outstanding Florida Waterways.

Please notify us of any agency decisions regarding this permit and its review processes.

Thank you.

Sincerely,



Marian Ryan, Conservation Chair
863-293-6961

Copies to:
Governing Board Members
Sierra Club Florida Executive Committee
Florida Department of Environmental Protection