

On a positive note, we had a successful Open House last Saturday, November 12. We did not have a crowd at Rum 138, in Ft. White, but the several members who came wanted to be more involved with Sierra Club. That is good news for me because we are working on creating a North SSJ Working Group in our northern counties: Hamilton, Suwannee, Union, Bradford, Baker, Gilchrist, and Columbia. If you live in these counties and want to be more involved in protecting our springs, rivers and aquifer, please contact me at maryvonne.deven@gmail.com. That group can meet in the Sierra Club office at Rum 138, and be more involved with issues pertaining to these counties. We have a Tri-County group covering Marion, Levy and Citrus counties that is very active and very involved, and the idea is to start a similar group in the northern counties. The Suwannee St. Johns Sierra Club is one of the largest in Florida so to be more productive, we need to be more organized. For example this past Tuesday, I went to speak up for Sierra Club to a Zoning and Planning Board meeting of the Columbia County, in Lake City, to voice our concern about a 40 sites RV construction on the Santa Fe River at River Rise...Some of you may want to be involved and come to the next meeting, either Zoning and Planning or County Commission, that will address this issue. Check their websites and come to that meeting (possibly December or January).

On the fun side, Rum 138 - Sierra Club office has a wonderful art gallery with so many artists, it is hard to name them all, John Moran, being the most famous, so it deserves a visit from Sierra Club members. Merrilee Malwitz Jipson, at Rum 138 is also planning to have music every Friday night, and start environmental film screenings as well in 2017. So stay tuned...

Last but not least, keep sending your ballots for the SSJ elections, or bring them to our last General Meeting, on December 1, 2016, at 7:00 pm. We will have Mike Byerly and County Commission staff with a short presentation on the Stormwater issue, plus an Awards ceremony, and a pot luck dinner (as Sierrans, bring your plate and utensils if possible). So, I certainly hope to see you there!

Conservation Report

By Whitey Markle

Many years ago in Lake City, the Suwannee River Water Management District, the St. Johns River Water Management District, and the Florida Department of Environmental Protection conducted a "public workshop" in which the regional water managers told us of a new plan for conserving the water in the Floridan Aquifer. We knew there was something afoot when the first speaker was State Senator Charlie Dean (who, as Chair of the Senate Natural Resources Committee, last year and the year before sponsored the worst water policy bill in Florida's history). He pontificated about the glories of a future in the region that included growth in human population and in agriculture. So here we are, years later, with a plethora of water quality and water quantity issues before us, all the results of poor water planning policy such as the North Florida Regional Water Supply Plan. (There is a similar plan in place in Central Florida but the illustrious legislature named it the Central Florida Water Initiative). Last week, the watchdog group, Our Santa Fe River, asked geologist and Executive Director of the Florida Defenders of the Environment to comment on the (draft) Plan as it relates of course to the Santa fe River. Jim Gross was a geologist for

the St. Johns River Water Management District until recently. Below is his reply. Below his reply is a link a website where you can submit your own comments.

To: Pamela Smith, Our Santa Fe River

From: Jim Gross, MS, PG, CPG

Date: November 18, 2016

Subject: Review of North Florida Regional Water Supply Plan, draft of October 4, 2016.

Purpose The mission of Our Santa Fe River, Inc. (OSFR) is to protect the aquifer, springs, and rivers within the watershed of the Santa Fe River. OSFR requested the author of this memorandum to review the draft North Florida Regional Water Supply Plan dated October 4, 2016 (draft plan), and to identify key issues that are of interest to OSFR in fulfilling its mission.

Comments on the draft plan

What's good in the draft plan:

1. The draft plan recommends that the entire planning region be designated as a Water Resource Caution Area.
2. Some of the water supply options identified in the draft plan are good, particularly those that reduce groundwater withdrawals. Conservation measures and use of reclaimed water are good ways to reduce groundwater withdrawals.

What's not so good in the draft plan:

1. From a big picture perspective, the key issue is how much groundwater we are pumping out of the Floridan aquifer system. The draft plan fails to fully characterize the magnitude, regional extent, and cumulative impact of this key issue.
2. The draft plan indicates that as of 2010, water use had already exceeded the sustainable yield of the fresh groundwater system. However, the draft plan fails to determine to what extent existing sources of water are adequate to supply water for all existing and future reasonable-beneficial sources of water and also sustain the water resources and related natural systems for the planning period. The magnitude of the problem has not been adequately assessed. If the magnitude of the problem is not known, the magnitude of the solution is not known. The districts should revisit the groundwater modeling analysis for the draft plan and incrementally reduce groundwater withdrawals until they demonstrate that all established and proposed minimum flows and levels can be achieved.
3. The draft plan takes a big detour around some key water supply constraints that were already identified in earlier planning efforts by St. Johns River Water Management District (SJRWMD) in its draft 2010 and draft 2013 regional water supply plans. Minimum flows and levels (MFLs) for Lake Brooklyn and Lake Geneva near Keystone Heights were key constraints in those two planning efforts. SJRWMD began to develop recovery strategies for those lakes as early as 2011. These MFLs need to be included in assessing the sustainable limit of groundwater withdrawals for the draft plan. Including them in the analysis could well demonstrate that the sustainable yield is even lower than excluding them.
4. Some of the water resource development projects included in the draft plan are little better than smoke and mirrors and have little or no potential to alleviate water resource

problems. For example: a. Diverting surface water to recharge groundwater so it can then discharge back to surface water. This is nothing more than a card trick. It does nothing to make more water available. b. Aquifer storage and recovery (or ASR) has little if any potential to address the key water supply constraint, cumulative withdrawals from the Floridan aquifer system. ASR is merely a management technique. It is typically used to store fresh surface water underground in an aquifer that does not contain fresh groundwater. Fresh surface water is stored underground when the supply is greater than the demand, and then recovered when the demand is greater than the supply. ASR is essentially a meaningless option over the western portions of the planning region. There are several reasons why ASR will not be an effective strategy for the western portions of the planning region: i) likely fresh surface water sources are already constrained by MFLs, ii) groundwater in the aquifer is already fresh water, and iii) any water injected underground would not be “stored”. It would simply increase discharge of groundwater back to surface water.

5. The Lower Floridan aquifer is identified as an alternative source of water supply. This is hooey and hydrologists know it. The Lower Floridan aquifer is simply part of the Floridan aquifer system as is the Upper Floridan aquifer. The two aquifers act as a single water-yielding unit.² There is a very limited potential to strategically utilize the Lower Floridan aquifer to mitigate existing water resource problems, but that potential comes with a risk of creating new water resource problems.

6. Brackish groundwater is identified in the draft plan as a water resource development option. However, it is more appropriately designated as an alternative water supply option. Regardless of how it is classified, the salinity of groundwater has little bearing upon the key constraint for this draft plan. If we are already pumping too much groundwater from the Floridan aquifer system, it really doesn't matter whether it's fresh or brackish.

7. The draft plan identifies optimizing groundwater withdrawals as a potential option. SJRWMD looked extensively at optimizing groundwater withdrawals in previous planning efforts using optimization algorithms in conjunction with groundwater flow modeling. The results of the optimization analyses were informative and clear: a) optimization can only marginally increase sustainable yields, and b) the infrastructure and unit production costs for most of the optimization scenarios exceeded the costs for other alternatives.

8. The draft plan states that the groundwater model is good enough for planning but not good enough for regulatory evaluations.³ That's a somewhat obtuse conclusion, but possibly irrelevant. The draft plan concludes that withdrawals already exceed sustainable limits. It's all one aquifer system. What further modeling is really needed for regulatory evaluations and decisions?

9. The section on climate change discusses uncertainties but ignores significant work looking at likely outcomes of climate change with respect to water supply sustainability. A report by Tetra Tech⁴ concluded that large portions of Florida are at high or extreme risk of exceeding sustainable supplies even without climate change. With climate change, most of Florida was identified to be at high or extreme risk of exceeding sustainable water supplies.

10. The Sufficiency Analysis in Chapter 6 of the draft plan is predicated only on the MFLs for the Lower Santa Fe and Ichetucknee rivers. As noted above, key constraints in the St. Johns River Water Management that have been ignored in this draft plan also need to be considered (Williams, L. J., and Kuniandy, E.L, 2015).

11. The draft plan fails to consider other potential strategies to decrease groundwater withdrawals. For example, there does not appear to be any discussion of seeking legislative authorization to levy fees for the withdrawal of water. Such fees could: a) serve as an economic incentive for further water conservation, b) help maximize reasonable-beneficial use, and c) provide an equitable revenue stream for funding alternative water supply development projects and water resource development projects.

12. There appears to be no consideration of coherent and credible regulatory strategies to balance reasonable-beneficial uses while sustaining water resources and related natural systems. In all cases, credible strategies must cap withdrawals at some defined level. Previous examples in Florida include: a) the water use caution areas in SWFWMD, b) the Central Florida Coordination Area rule that capped groundwater withdrawals at a defined withdrawal horizon, and c) the cap on withdrawals from the Biscayne aquifer in southeast Florida. While a regional water plan cannot implement such strategies, there should be some reasoned discussion of approaches that can be taken both on an interim and long-term basis.

13. Language in Appendix G, the Recovery Strategy for the Lower Santa Fe River Basin, provides an example of a strategy element that is not credible: “Applications that do not demonstrate a potential impact to the MFL water bodies shall be issued provided the applicant meets the conditions for issuance.” This language seems to indicate that it is incumbent upon the applicant to demonstrate an impact, and that in the absence of such demonstration it is presumed that there is no impact. A demonstration of impact is clearly not in the interest of the applicant. Rather, it should be incumbent upon the applicant to demonstrate that the proposed withdrawal of water will not cause a potential impact. Conclusion The draft plan does not contain sufficient information, analyses, and recommendations to provide assurance to OSFR that the aquifer, springs, and rivers within the watershed of the Santa Fe River will be protected .

Jim’s letter points out another example of poor resource management. Political and government “leaders” are obviously willing to condone this type of public policy. In a climate where the word Conservation causes people to react adversely, where common sense gives way to financial gain, and where science is absolutely ignored or imitated, we are in deep trouble.....and, judging by the election, it is not getting any better.

Link to Jim’s Gainesville Sun article: <http://www.gainesville.com/news/20150621/jim-gross-water-management-in-florida-is-lacking-in-bold-leadership>

Here is the link to read the plan and the place to make comments.
<http://northfloridawater.com/watersupplyplan/draft.html>

MONEY AND POLICY IN THE ELECTION(S)

We have now seen two great examples of common sense dominating over money: in the August election in Alachua County election, and in November in the general election. County Commissioner Mike Byerly defeated challenger Kevin Thorpe in the face of massive Chamber of Commerce and Plum Creek Real Estate Investment Trust campaign funding and endorsement, as well as a nasty smear campaign by the same entities that attempted to paint Byerly and the incumbent County Commission as “environmental racists”. Also, against a giant spending effort by the Florida energy companies, we were

able to stave off Amendment One (Solar Choice). In my eyes, this was the biggest victory in the election. Obviously the slick radio and TV ads were too slick for the voters to swallow. And we were able to write letters to newspapers, call in to radio shows, interview with TV stations, sit at the polls, and place the multiplicity of VOTE NO ON 1 signs everywhere we could in the last days of the election cycle. Another good vote was that of the Alachua County tax referendum for stormwater runoff control.

Conversely, massive spending by the Florida Republican pac(s) on the race for State Senator (Republican state representative Keith Perry vs. Democrat ex-state senator Rod Smith) was able to convince the public to vote for Perry. This is unfortunate for us in the environmental community. Perry stated on television before the 2014 referendum on re-establishing funding for Florida Forever (Amendment 1), "The citizens have no right to tell us legislators how to spend their money...we (legislators) know more than they do about spending". Win some, lose some. Four environmental group leaders around the state ran for Soil and Water Conservation District Supervisor positions. Unfortunately none of them won. One of them was yours truly, who lost big time in Marion County.....60+k to 30k. Oh well, so much for my political career.

GLOBAL WARMING AFFECTS ANNUAL MULLET FESTIVAL

Each year around the full moon in November, I throw a neighborhood party for which we catch, clean, and smoke 100 pounds of Mullet. The party started when we were attempting to be "independent" back-to-the-landers in the late 1970's. We caught and sold Mullet (and Catfish) and we had lots of seafood at our expense. So we started throwing fish and beer parties on the weekends when we had extra fish. To make this long story short, we eventually started calling it the Mullet Festival. This year was the 34th Mullet Festival, and it was one of the best yet. We had the traditional keg of Budweiser, potluck side dishes aplenty, local musicians picking the music under a giant Oak tree with a great bonfire. The only difference in this year and prior years was that we were a little short on the Mullet. Apparently, because the water temperature in the Gulf of Mexico is still quite warm, I wasn't able to catch the 100 mullet I usually catch for the festival. The last two trips to Yankeetown yielded a mere 4 fish. SO I ended up at festival time with 27 Mullet and 2 Black Drum. It turns out it was plenty.....a lot of my old fish-eating friends are on weird diets now where they eat only vegetables!

Some years this happens, and it seems like it happens more and more lately. If the "pregnant" Mullet think it's too warm they actually absorb the Roe rather than lay it in the warm water. Also the full moon was earlier in November this year. Maybe the Mullet ran up and hid in the creek and hid from me.

COLUMBIA COUNTY BOARD SENDS LETTER TO UNION/ BRADFORD: NO MINING PLEASE.

The Columbia County Board of County Commissioners voted unanimously to send a letter to Union and Bradford County Commissioners, the U.S. Army Corps of Engineers, and the Suwannee River Water Management District opposing the proposed mines in Union and Bradford Counties at their monthly meeting on Tuesday evening, November 15th. We congratulate Our Santa Fe River and the activists who proposed this letter to the Columbia County Commission.

Sabal Trail Pipeline Action How to Guide

by Merrillee Malwitz-Jipson

This is an informal how to guide for action to be a witness to violations and non-compliance issues associated with permits on the Sabal Trail Gas Transmission.

You do not have to know everything about a permit to be aware of concerns associated with this construction project to build a 36" gas pipeline into the wetlands, rivers, springs, lakes, sandhills, karstic features, swamps, mud bogs and neighborhoods of Alabama, Georgia and Florida.

What you do have to know or sense is this does not look right and there is something wrong.

When you approach the 50 to 100 feet of a Right of Way (ROW), slowly approach and maneuver your car to park in a secure side of the road, without trespassing on to anyone's property. The FHP officers have asked that we wear bright yellow or orange vests if we are on busy roadways.

Make sure you have a camera, pen and paper. Look around and size up the situation. Get out of your car carefully and do remember that there will be traffic coming through these public roads. Take your time, you are allowed to be on the shoulder of a public right of way. You may take pictures. Look at the edges of the destruction corridor and think about 100 or 50 feet of clear cutting. You can count it out with your feet, if you can guess what 12 inches looks and feels like under you feet and walk the entire stretch.

There are many times that the work site needs additional space, beyond 100" ROW. But, question that too. Because we have found them working outside the limited ROW space and that is a violation.

The gopher tortoise permit issued by FWC was supposed to be one of the few permits that was to be on display at a work site, but we have not found one permit on site, instead we find inadequate signs or posters that speak about habitat to threatened and endangered and species of interest, such as the Florida black bear.

Take pictures of all the signs, including the orange road signs. Very rarely do you see signs that say pipeline construction ahead, instead they say "road work ahead" or "simply construction ahead".

The lack of permits on site and the lack of adequate signage is significant as it speaks to the fact that much of the public still does not know about this compressed gas transmission pipeline being dug into Florida.

Make a record, videotape, take pictures, written record, date time, location and who or description of interaction.

Many times the worker people will come to you and try make you leave. Know your rights, you are allowed to be in a public right of way. They cannot make you to leave. You are allowed to document what you see. You may ask them questions.

Send your materials and comments to:

<https://www.ferc.gov/docs-filing/ecomment.asp>

file report in the ecomments under docket number CP15-17

Depending on the issue, you may also want to contact your US Congressional leadership. US Senators and US Representatives are the ones who can ultimately stop the entire project.

If there is something egregious like an undocumented sinkhole, like citizens found in Suwannee County recently on CR 49, please consider contacting the press and use social media to get the word out.

Need a speaker for your group?

The Tri-County Working Group, in conjunction with the Sierra Club Educational Committee, is embarking upon an educational tour, offering a slide show and accompanying discussion to acquaint interested groups in our area with the main environmental issues that Sierra Club is concerned with. The hope is that this education program motivates people to practice both good conservation habits as well as the will to press our government officials to seek more effective solutions. If anyone knows of any type of group, club or home owners association that might be interested, contact Education Chair Jon Brainard..... (407) 491-8158 or jonbrainard@gmail.com.



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