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January 10, 2013

Dwight Jenkins, J.D., P.G., Hydrologist IV  
Timothy Wetzel, Regulatory Scientist II  
Department of Regulatory Services  
St. Johns River Water Management District  
4049 Reid Street  
PO Box 1429  
Palatka, FL 32178

RE: Adena Springs Ranch; CUP Application No. 2-083-129419-1 (pending)

Gentlemen:

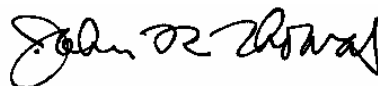
On behalf of Jeri Baldwin and Karen Ahlers, I wanted to add a couple further points regarding the incompleteness of the above-referenced Amended Application:

- 1) As we pointed out, "The Amended Application remains incomplete, because, among other reasons, the Agricultural Conservation Plan has not been submitted." We should add that CUP Applicants' Handbook Section 12.5.7.1 requires "All permit applicants for agricultural use-types must submit a water conservation plan for their operation to the District at the time of permit application." A.H. §12.5.7.1. The Applicant's assertion that the Conservation Plan can be submitted after the permit issues must be rejected.
- 2) The above-referenced Handbook Section also requires "In evaluating whether existing water conserving activities are sufficient to meet the applicable criteria in Rule 40C-2.301, F.A.C., the District will take into consideration the use type and efficiency of the specific use relative to other similar users." The Applicant must be required to explain the proposed use of 309 gallons per day per cow to create beef and compare it to other similar users.

Thank you for considering these additional matters.

Sincerely,

LAW OFFICE OF JOHN R. THOMAS, P.A.



John R. Thomas

CC: Governing Board