Alachua County
Board of County Commissioners

October 15, 2024

gcoerper@cityofalachua.org
The Honorable Gib Coerper, Mayor
City of Alachua
15100 NW 142 Terrace
Alachua, Florida 32615

RE: Tara Projects around Mill Creek Sink

Dear Mayor Coerper,

The Alachua County Board of County Commissioners appreciates the City of Alachua's continued dedication to sound planning and protection of our community's shared water resources. At our October 1, 2024 special meeting, the County Board made a motion to provide a Chair letter to the city to discuss holding off on any approvals of Tara April, Tara Forest West, and Tara Phoenicia and any other projects in the Mill Creek Watershed.

The County has serious concerns regarding stormwater management at the proposed Tara Forest West, Tara Phoenicia, and Tara April projects. These properties are within the Mill Creek watershed and in close proximity to Mill Creek Sink, and in the case of Tara Phoenicia, is overtop of the mapped Mill Creek Cave System. All of the proposed stormwater basins for these projects will discharge water in close proximity to the sink, which will directly make its way to the Floridan aquifer via the sink or ground below the basins. Mill Creek Sink and the Mill Creek Cave System are outstanding geological features to be preserved and protected. Due to the sensitive nature of this project, the Board requests that these applications be further evaluated before they are approved.

The quality of water entering the Floridan aquifer via Mill Creek is of utmost importance. This water has been traced to Hornsby Springs, a first-magnitude spring impaired for nutrients, located on the Santa Fe River. The Floridan aquifer is the only source of drinking water for western Alachua County.

The lower area of the Mill Creek watershed contains considerable relief. This area is on the edge of the escarpment of the Hawthorn Group and karst features dominate the landscape. The surrounding area is comprised of numerous closed basins, depressions and sinkholes. The residual reworked Hawthorn Group materials (primarily clayey sands and sandy clays) present on the surface mask many karst

features that are present at depth. The swallet for Mill Creek Sink is relatively small and could easily become obstructed.

Protection of Mill Creek Sink and the lower portion of the basin must begin with a stormwater master plan that addresses both quantity and quality. The entire area of the intersection of US Hwy 441 and I-75 that drains to Mill Creek Sink should be included in the plan. The proposed Tara Projects are a significant portion of surrounding properties that remain to be developed. Over 90 acres surrounding Mill Creek Sink are within the 100-year flood plain. Increased impervious area will increase the flooding potential. A stormwater master plan that recognizes the karst sensitive nature of this area is especially important because every parcel developed will have outfalls that direct additional water to Mill Creek Sink.

Aside from the regional issues, the County has specific comments related to the development of the proposed Tara Projects. These comments are as follows:

- A detailed investigation of the karst geology at the site deeper than just the upper fifteen feet must be conducted to define potential impacts and determine what measures are necessary to protect the subsurface Mill Creek Cave System and the Floridan aquifer.

- The geotechnical investigation should be supplemented with a geophysical assessment (EMI & GPR) of the entire project area with appropriate additional transects within the proposed stormwater basin locations.

- The proposed use of several large basins for all of the stormwater is of considerable risk in karst environments and should be re-evaluated.

- The use of dry retention systems for stormwater treatment should be re-evaluated. Given the high clay content of the underlying soils, it is likely these basins will fail to function as designed and will be subject to frequently sinkhole formations similar to what we are currently seeing at the Lowe's stormwater retention ponds. Smaller wet detention ponds in conjunction with LID treatment train systems would be a better design option to reduce the risk factors.

- Stringent surface water pollution prevention (SWPP) plan implemented to reduce erosion and off-site sedimentation must be implemented and enforced.

- A monitoring system should be put in place to demonstrate that the development is not causing significant harm or to demonstrate that when impacts are accruing to the system, they are not caused by this project.

We believe that the City of Alachua has put in place strong Comprehensive Plan and Code language that protects our shared water resources and that supports requiring modifications to these developments to avoid significant harm to our water quality, drinking water, aquifer and sensitive cave system.

The most effective way to protect the Mill Creek Sink system is through the purchase and preservation of these lands to protect water quality in the Floridan aquifer and reduce flooding potential in this closed

basin. Because of the potential costs of these lands, acquisition partners including, FDOT, SRWMD, the County, and non-profits may need to work together with any willing sellers to make this happen. Mill Creek Sink and the Mill Creek Cave System are outstanding geological features that must be preserved and protected.

Sincerely,

Mary C. Alford, Chair
Alachua County Commission
Chr25.001

xc: Alachua County Board of County Commissioners
Michele Lieberman, County Manager
Sylvia Torres, County Attorney
Mike DaRoza, City Manager
Marian Rush, City Attorney
Stephen Hofstetter, County Environmental Protection Department Director