



# St. Johns River

## Water Management District

Ann B. Shortelle, Ph.D., Executive Director

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On the internet at [www.sjrwmd.com](http://www.sjrwmd.com).

Steve Greene, AICP  
Chief Planner  
Office of Planning & Zoning  
315 West Main Street, 5<sup>th</sup> Floor  
Tavares, FL 32778

January 29, 2019

Mr. Greene,

This letter is in response to an item on your February 8 Planning and Zoning Board meeting proposing approval for a conditional use permit for a firearms training range.

The District owns the Emeralda Marsh Conservation Area, which is adjacent to the Treasure Island Range. The Conservation Area was designated a National Natural Landmark by the National Park Service in 1974. We began restoring Emeralda Marsh in 1994 and opened it for public recreational use, including a popular interpretive drive, a boat launch, and a handicapped-accessible wildlife viewing platform.

Treasure Island Range, as built, is incompatible with public use of the Conservation Area. Part of that conservation area is now closed to the public and accessed under very limited circumstances by land resources staff. It is closed to ensure public safety because of the amount of live fire that escapes the Wilkerson property and enters the Conservation Area.

Treasure Island Range, as built, has an adverse effect on the Conservation Area. In 2018, the District was approached by Lake County Sherriff Deputies requesting an estimation on the amount of property damage caused by the escaping rounds. Our land resources staff, until being restricted because of live fire, conducted an inspection of the property adjacent to the shooting range and found 56 damaged trees whose replacement value was estimated to exceed \$100,000.

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We would like to reopen that part of the Conservation Area for public recreation, but will only do so if we can assure the safety of our staff and the visiting public. Much of the safety problem and property damage could be reduced or prevented by berms that are designed and built to contain a higher and wider range of fire.

We do not object to a well designed and constructed firing range and are hopeful the necessary and proper precautions can be undertaken by the range operators to secure a safe environment for the Emeraldal Marsh Conservation Area.

Thank you for your consideration of our concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "William Abrams", written in a cursive style.

William Abrams

General Counsel

St. Johns River Water Management District