

## **Addendum 2—Advisory Group Members and Report**



**O'Leno State Park and River Rise Preserve State Park  
Dudley Farm Historic State Park  
Advisory Group Members**

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**Local Government Representatives**

The Honorable Ken Cornell,  
Chair, Alachua County Board of  
County Commissioners

The Honorable Everett Phillips,  
Columbia County Board of  
County Commissioners

**Agency Representatives**

Gabby Paxton, Park Manager  
Division of Recreation and Parks  
O'Leno, River Rise, Dudley Farm

John Chamberlain  
Alachua County Soil and Water  
Conservation District

Lamar Mosley  
Columbia County Soil and Water  
Conservation District

Doug Longshore  
Florida Forest Service

Nathan Lambert  
Florida Fish and Wildlife  
Conservation Commission

Jason O'Donoghue, Archaeologist  
Florida Department of State  
Division of Historical Resources

**Environmental and Conservation  
Group Representatives**

Jacqui Sulek, President  
Four River Audubon Society

Tom Kay, Executive Director  
Alachua Conservation Trust

**Recreational User Group  
Representatives**

Tom Hewlett, President  
Yellow-Bellied Sliders Bicycling Society

Jack Varnon, President  
Newberry Lions Club

**Cultural and Historical Group  
Representatives**

Bob Watson, President  
High Springs Historical Society

Peggy MacDonald, Executive Director  
Matheson History Museum

**Tourism and Economic  
Development Representative**

Bill Richards, Chair  
Alachua Tourist Development Council

**Local Private Property Owners**

Harriet Walsh, Local Resident  
Property Owner

Chuck Geiger, Local Resident  
Property Owner

**Citizen Support Organizations**

Ed Bisch, President  
Friends of O'Leno

Art Wade, President  
Friends of Dudley Farm

**O'Leno State Park and River Rise Preserve State Park  
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The advisory group meeting to review the proposed unit management plans for O'Leno State Park, River Rise Preserve State Park, and Dudley Farm Historic State Park was held at the Recreation Hall at O'Leno State Park on April 5, 2017.

Ken Cornell, Everett Phillips, John Chamberlain, Lamar Mosley, Tom Kay, Jack Varnon, Bob Watson, Peggy MacDonald, and Bill Richards were not in attendance. All other appointed advisory group members were present as well as Merrilee Malwitz-Jipson, Kristin Rubin, Walt and June Thon, Cindy Noel, and Pam Smith. Attending staff were Gabby Paxton, Jason Vickers, Dan Pearson, Anne Barkdoll, and Tyler Maldonado.

Mr. Maldonado began the meeting by explaining the purpose of the advisory group and reviewing the meeting agenda. He provided a brief overview of the Division of Recreation and Parks' (DRP) planning process, and Mr. Paxton summarized public comments received during the previous evening's public hearing. Mr. Maldonado then asked each member of the advisory group to express his or her comments on the plans.

During the two-week public comment period following the advisory group meeting, the DRP received numerous emails from members of the public about the O'Leno State Park, River Rise Preserve State Park, and Dudley Farm Historic State Park management plans. The major themes of these emails are as follows:

- The dump station associated with the proposed equestrian campground redevelopment at River Rise Preserve State Park should be moved to higher ground away from the Santa Fe River to mitigate environmental impacts to the greatest extent possible.
- The existing restroom facility at the River Rise West equestrian campground should be renovated in order to replace the septic system and protect the recharge area from septic discharge. The restrooms at O'Leno State Park should also be upgraded for the same purpose.
- It was suggested that dollars allocated to the development of new facilities or renovation of existing facilities should instead be diverted to increase the salary of park staff and pay for new employees to manage the parks' resources and staff events held at the parks.

**Summary of Advisory Group Comments**

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**Doug Longshore** (Florida Forest Service) commented on the desired future conditions portion of the O'Leno State Park and River Rise Preserve State Park natural communities section. He suggested including the basal area, range, and tree per acre when determining the desired future condition of pine-dominated natural community types. He complimented the DRP on the hydrological monitoring objectives. He suggested adding prominent hydrological features to the reference map in the Introduction of the O'Leno State Park and River Rise Preserve Park management plan.

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**Nathan Lambert** (Florida Fish and Wildlife Conservation Commission) commented on natural community management and restoration efforts, particularly those management efforts related to prescribed burning. He urged the DRP to conduct complete burns, especially in areas with fire breaks and land alteration. He stated that it would be beneficial for the management plan to include past history and current conditions of natural community restoration efforts. He stated the annual range for prescribed burning target acreage for O'Leno State Park and River Rise Preserve State Park seemed to be an obtainable goal and could be exceeded. In reference to the Dudley Farm Historic State Park management plan, Mr. Lambert inquired about what had been accomplished in terms of prescribed burning. It was stated that old pastures had been burned and longleaf planting had been conducted. The park is to be managed in a manner that mimics the way in which the Dudley's would have historically managed the farm. He encouraged the DRP to add to the exotic species discussion the degree to which infestations are taking place, in terms of the percentage of management zone infestation.

**Harriet Walsh** (Local Private Property Owner) expressed her concern with the multi-use trails at River Rise Preserve State Park in the River Rise East portion of the park. She was concerned with conflict between users of the trails, which include equestrians, hikers, and bikers. She suggested developing separate trails for cyclists and adding signage at trail crossings. Ms. Walsh recommended including interpretive information at the River Rise East trailhead that educates trail users on proper etiquette when encountering horses on the trails. She asked about the proposal to upgrade the cabins with air conditioning units at O'Leno State Park. It was stated that it is more efficient to work with the Division of Historical Resources on adaptive reuse of the cabins, as opposed to building new cabins.

**Art Wade** (Friends of Dudley Farm) stated that the language in the management plan for Dudley Farm Historic State Park is prohibitive to infrastructure improvement other than what has been explicitly outlined by the Conceptual Land Use Plan. He commented that the Citizen Support Organization for Dudley Farm Historic State Park is able to raise funds for infrastructure improvement, and the group has been offered historical farm equipment but could not accept these donations because of a lack of covered structures to display the equipment while keeping them out of the elements. Mr. Wade suggested constructing an open-air pavilion to the west of the proposed indoor education center to store, display, and interpret historical farm equipment. He also recommended developing a resident volunteer camping area in order to allow Dudley Farm Historic State Park to increase the number of resident volunteers, which would allow the park to have a camp host for youth group camping activities.

**Jacqui Sulek** (Four Rivers Audubon) was thankful for the management plan and the historical record it establishes for the parks. She was appreciative of the proposed Dogwood campground area redesign at O'Leno State Park, which converts the campground from an RV campground to a tent and pop-up campground. She stated that all multi-use trails should be designated as such with the appropriate signage. She expressed her apprehension toward the conversion of the rustic cabins at O'Leno State Park to cabins with air conditioning for year-round usage.

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She suggested highlighting the parks as a destination for bird watchers and wildlife enthusiasts, a recreational activity that she stated is an underutilized asset.

**Tom Hewlett** (Yellow-Bellied Sliders Bicycling Society) stated that the DRP should incorporate a discussion of the High Springs to Newberry Rail-to-Trail project and how the parks could include additional recreational opportunities for cyclists. He expressed his desire to see more bike trails developed at O'Leno State Park and River Rise Preserve State Park. He commented that the current length of biking trails at the parks are not enough to make the parks a destination for cyclists, which would be a missed opportunity with the development of the High Springs to Newberry Rail-to-Trail project. He recommended the development of a biking and hiking trail that extends from River Sink to River Rise. In addition to recreation, this trail would allow for interpretation of the historic 7-mile land bridge between the two karst features.

**Summary of Written Comments from Advisory Group Members**

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**Tom Hewlett** (Yellow-Bellied Sliders Bicycling Society) wrote that High Springs is expected to become a destination for cyclists as new trails such as the High Springs to Newberry Rail-to-Trail project are completed, and the park should plan on developing more trails to attract cyclists to O'Leno State Park and River Rise Preserve State Park. He stated that the soils on some of the multi-use trails are too sandy for cyclists and therefore will not be used by cyclists. As such, he suggested developing biking trails in areas where soils are appropriate for biking. The written comments submitted can be read in full starting on page A 2 - 7.

**Jason O'Donoghue** (Florida Department of State – Division of Historical Resources) stated that there are discrepancies between the cultural resources recorded in the O'Leno State Park and River Rise Preserve State Park management plan and those that have been submitted to the Florida Master Site File for evaluation. Following the submission of these cultural sites to the Florida Master Site File, he wrote the number and discussion of the cultural resources found at the parks will need to be revised. He found no discrepancies in the Dudley Farm Historic State Park management plan. He offered DHR's assistance in addressing the documentation of cultural resources found at the parks. The written comments submitted can be read in full starting on page A 2 - 9.

**Summary of Public Comments**

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**June Thon** (Friends of O'Leno) commented on the ADA-accessibility of the suspension bridge at O'Leno State Park, citing an example of an electrified wheelchair's difficulty crossing the bridge. She stated that ADA-accessibility should be improved at the day use area.

**Pam Smith** (Our Santa Fe River) expressed her concern with the proposed dump station associated with the equestrian campground redevelopment at the River Rise West portion of River Rise Preserve State Park. She stated that elevated levels of

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nitrate concentrations in the Santa Fe River are currently creating visible elements of impairment to the river and asserted that the establishment of a dump station will lead to a further increase in nitrate concentrations. Ms. Smith emphasized that human activity should be significantly reduced and human waste facilities associated with recreational use areas should be upgraded in order to protect the Santa Fe River. She urged that protection and restoration of the Santa Fe River should be a top priority for the DRP.

**Merrilee Malwitz-Jipson** (Our Santa Fe River) suggested separating trails, as opposed to categorizing trails as multi-use, to avoid conflicts between different user groups at O'Leno State Park and River Rise Preserve State Park. She recommended improving the interpretive signage at River Rise and Big Suck. She stated that the equestrian campground redevelopment at River Rise Preserve State Park will increase human activity near the Santa Fe River, which is currently impaired due to human activity. A particular point of contention was the inclusion of a dump station with the proposed equestrian campground redevelopment. She urged the DRP to move the location of the dump station to higher ground away from the Santa Fe River and suggested researching alternatives to the traditional dump station.

**Cindy Noel** (Our Santa Fe River) stated that the DRP should update its public hearing and advisory group comment form to fully describe the proposed projects contained in the management plans.

**Staff Recommendations**

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The staff recommends approval of the proposed management plans for O'Leno State Park, River Rise Preserve State Park, and Dudley Farm Historic State Park as presented, with the following significant changes:

- Any discrepancies between the cultural resources recorded in the O'Leno State Park and River Rise Preserve State Park management plan and those submitted to the Florida Master Site File will be addressed.
- Language will be added to the Land Use Component to discuss the High Springs to Newberry Rail-to-Trail project and explore ways the parks could incorporate cyclist-friendly amenities.
- The equestrian campground redevelopment language in the Conceptual Land Use Plan section of the Land Use Component will be revised. These revisions will include language that states the location of the dump station will be moved upland. Other methods to ensure the appropriate usage of this site, such as keypad entry to the equestrian campground area, will be explored.

**Notes on Composition of the Advisory Group**

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**Florida Statutes Chapter 259.032 Paragraph 10(b)** establishes a requirement that all state land management plans for properties greater than 160 acres will be

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reviewed by an advisory group:

"Individual management plans required by s. 253.034(5), for parcels over 160 acres, shall be developed with input from an advisory group. Members of this advisory group shall include, at a minimum, representatives of the lead land managing agency, co-managing entities, local private property owners, the appropriate soil and water conservation district, a local conservation organization, and a local elected official."

Advisory groups that are composed in compliance with these requirements complete the review of State park management plans. Additional members may be appointed to the groups, such as a representative of the park's Citizen Support Organization (if one exists), representatives of the recreational activities that exist in or are planned for the park, or representatives of any agency with an ownership interest in the property. Special issues or conditions that require a broader representation for adequate review of the management plan may require the appointment of additional members. The Division's intent in making these appointments is to create a group that represents a balanced cross-section of the park's stakeholders. Decisions on appointments are made on a case-by-case basis by Division of Recreation and Parks staff.

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Florida Department of Environmental Protection

Division of Recreation and Parks

Comment form for O'Leno State Park, April 21<sup>st</sup>, 2017

There are a minimal number of bike trails designated in O'Leno State Park, no increase from the previous plan. At this time, Alachua County has begun the creation of Rails to Trails multiple use trails. One of these trails that come close to O'Leno State Park will be completed in much less than 5 years. The first trail to be completed next year will connect High Springs to Newberry trail. Also by next year High Springs will have a trail that goes to the Santa Fe River which is next to the entrance to River Rise West. High Springs will be a trail head for these trails and the number of bicyclists will increase several fold in the area.

The number of people who use bicycling as a recreational sport increases yearly! Bicycle clubs in this area include: The High Springs Yellow Bellied Sliders, Suwannee Bike association in White Springs, Gainesville bike club, San Felasco bike group and others. These clubs equate to several thousand bicyclist in this area as well as individual and families that like to bike.

Presently in the O'Leno State Park there are approximately 7 miles of designated bicycle trails and this is not enough distance to entice most bicyclist to come here for a ride. The River Sink area is off limits to bicycles and one of the most spectacular trails of O'Leno Park, to the Santa Fe River Rise, is designated a hiking trail only. Many more trails that were created in O'Leno Park as well as River Rise East and West were developed as horse trails. Due to horse traffic many of these trails are deep sand and not useable, even to the most enthusiastic mountain bikers. I was informed at the recent Advisory Meeting that most of the access roads and all of the horse trails are available to bicyclist. Having biked in O'Leno for 10 years I was surprise that I did not know this.

O'Leno State Park must increase the number of miles designate bicycle trails by several fold. I proposes designating two bicycle trails in the park, they would be bicycling and hiking but be marked on the trail and on a map as suitable for bicycling:

1. A trail starting at the entrance to River Rise West on State Road 27 that goes across through River Rise East and ends at the main section of the park, picnic area and pavilions. This would create two exciting destinations for bicyclists:
  - 1a. Trail would open a new option for bicyclist in O'Leno campgrounds, a path to down town High Springs for restaurants, museum and shopping.
  - 1b. Bicyclist at the High Springs trail head would have a beautiful path to the O'Leno State Park nature center, river sink and suspension bridge and connects to the Ichetucknee/O'Leno bike trail.
2. A trail starting at the entrance to River Rise East that ends at River Rise. This path would allow more people to view the spectacular sight of the Santa Fe River returning to the surface. This is a beautiful Park treasure that is seen by canoe and kayakers but few hikers.

Using existing trails and service roads that are suited to off road bicycling would allow for more bike traffic in the park, increase the number of people visiting the park per year without increasing the number of trails and therefor have no increase on impact of the park environment.

Proposed by: Thomas Hewlett

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FLORIDA DEPARTMENT *of* STATE

RICK SCOTT  
Governor

KEN DETZNER  
Secretary of State

April 4, 2017

Tyler Maldonado  
Park Planner  
Office of Park Planning  
Florida Department of Environmental Protection  
Division of Recreation and Parks  
3900 Commonwealth Boulevard, MS 525  
Tallahassee, FL 32399

Dear Mr. Maldonado,

Thank you for inviting the Division of Historical Resources (DHR) to participate in the advisory group review of the draft management plan for O'Leno State Park and River Rise Preserve State Park. We have completed our review and have the following comments and recommendations:

1. We note several discrepancies between your records and those of the Florida Master Site File (FMSF). Table 4 of the management plan (pp. 93–105) lists 74 archaeological sites, 56 historic structures, 5 resource groups, and 3 historic bridges. However, documentation of many of these resources has not been submitted to the FMSF, nor has their potential significance been evaluated by the State Historic Preservation Officer. These include:
  - a. Historic structures CO1138–CO1175, CO1178–CO1187, and CO1202.
  - b. Historic bridge CO1203.
  - c. Resource groups AL5665, AL5666, CO1176, and CO1204.
2. Several resources recorded in the FMSF database are not recorded in Table 4 of the management plan. These include:
  - a. Historic structures CO753 and CO1351–1369.
  - b. Resource groups: O'Leno State Park Historic District (CO1260, listed on the National Register of Historic Places) and O'Leno Park Road (CO1350).
3. Based on our records, two of the archaeological sites listed in Table 4 (CO31 and CO34) are not located within the boundaries of the parks. However, it should be noted that these are recorded as "general vicinity" sites in the FMSF, so their precise location is not

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known. If park staff have specific knowledge of the site locations, please contact the FMSF so that their records can be updated.

4. The significance level assigned to many of the resources does not accurately reflect the assessments of the SHPO. As noted in point 1, the sites not fully documented with the FMSF have not been evaluated by the SHPO, and thus their significance in Table 4 should be NE. Sites AL179, AL2886, AL2926, AL5654, and CO1200 have also not been formally evaluated and site CO731 was determined to be not significant. In many cases these sites may be considered NR eligible by the individual that documented them (referred to as the "surveyor" in FMSF records), but this does not constitute an evaluation by the SHPO. If the intent of Table 4 is to present the informal opinions of surveyors, then that should be made explicit. Both the surveyor's opinion and the SHPO evaluation are recorded in the FMSF. Finally, it should be noted that the sites that contribute to the O'Leno State Park Historic District (CO1260 – NR listed) have not been evaluated individually. These are: AL5654, CO385–CO391, CO1177, and CO1350–CO1362. Clearly there is ambiguity in this category.
5. An accurate cultural resources inventory is critically important for effective management. The full listing of cultural resources in the FMSF is enclosed. Reconciling these records with Table 4 of the plan yields a total inventory of 72 archaeological sites, 76 historic structures, 7 resource groups, and 3 historic bridges. Please work with Florida Park Service Archaeologist Bill Stanton and the FMSF to rectify the discrepancies noted above. Staff from DHR's Public Lands Archaeology program (PLA) may also be able to assist you.
6. The plan reports total number of cultural sites as 128 on pages 2, 126, 129, and Table 7. This will need to be updated, based on the above comments. The total number of archaeological sites, structure, bridges, and resource groups will likewise need to be updated on pages 85, 88, 89, 126, 137, and in Table 7.
7. Page 85, paragraph 5: it should be noted that the survey conducted by CARL archaeologists Weisman and Newman in 1991 was not exhaustive and did not systematically examine the entirety of River Rise Preserve. Additional archaeological sites no doubt exist, but remain to be documented. Staff from DHR's Public Lands Archaeology program (PLA) are available to conduct a cultural resources reconnaissance survey and provide management recommendations.
8. Page 86, paragraph 1: one of the mandates of DHR is to respond to violations of Chapter 267.13 of the Florida Statutes. PLA staff are available to conduct damage assessments of looted archaeological sites and provide recommendations for their stabilization.
9. Page 86, paragraph 2: the statement "most of these sites [are] ineligible for the National Register of Historic Places" is inaccurate since only half of the archaeological sites (n=36) are considered ineligible by either the surveyor or the SHPO. The rest of the sites have either not been evaluated or there is insufficient information to make a determination.

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10. Page 86, paragraph 4: two points about the statement "Ogden Pond Mounds A (AL3067) and B (AL3068), both possible Weeden Island sand mounds, are locally significant in the opinion of SHPO archaeologists." First, the phrase SHPO archaeologists is confusing. Either the opinion is that of the SHPO or it is that of the surveyor. If the individual providing this opinion was an archaeologist from DHR, they are still considered the surveyor and their opinion is separate from that of the SHPO. Second, FMSF records indicate that there is insufficient information to make a determination. A citation is needed here to substantiate the claim they the sites are considered significant.
11. Page 87, paragraph 1: see above comment regarding "SHPO archaeologist."
12. Staff from DHR's Bureau of Historic Preservation are available to advise in matters pertaining to historic structure assessment. Likewise, staff from DHR's Research and Conservation Laboratory are available to assist with curation of the park's collections.
13. Page 126: we are supportive of the development of more formalized procedures for site monitoring and are available to advise if needed.
14. Page 128: PLA staff are available to assist with relocating sites and updating boundaries.
15. With regard to the goal "Protect, preserve and maintain the cultural resources of the park" (pg. 126-130 and Table 7, Goal VI), Actions 3 and 4 of Objective B refer to a "level 1" archaeological survey of the parks. While we agree that additional survey is needed, this terminology is not consistent with that used by cultural resource management professionals and it is therefore unclear what the parameters of this project would be. Please refer to Module 3 of DHR's [cultural resource management standards and operations manual](#), which details the scope of archaeological fieldwork of varying intensities (e.g., reconnaissance survey, phase I survey, phase II testing) and adjust the wording accordingly.

Please let us know if you have any questions or concerns regarding these comments. Thank you again for inviting us to participate and for your diligence in preserving, promoting, and interpreting Florida's cultural heritage.

Sincerely,



Jason O'Donoughue, Archaeologist III  
Bureau of Archaeological Research  
Division of Historical Resources

Enclosures: O'Leno&River\_Rise\_FMSF\_Sites.xlsx

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FLORIDA DEPARTMENT *of* STATE

RICK SCOTT  
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KEN DETZNER  
Secretary of State

April 3, 2017

Tyler Maldonado  
Park Planner  
Office of Park Planning  
Florida Department of Environmental Protection  
Division of Recreation and Parks  
3900 Commonwealth Boulevard  
Tallahassee, FL 32399

Dear Mr. Maldonado,

Thank you for inviting the Division of Historical Resources (DHR) to participate in the advisory group review of the draft management plan for Dudley Farm Historic State Park. We have completed our review and have the following comments and recommendations:

1. The narrative summary of cultural resources in the park is thorough and well-written. We are particularly impressed by your discussion of cultural landscapes in the park.
2. We would note that additional cultural resources, particularly pre-Columbian archaeological sites, no doubt exist and remain to be documented. Staff from DHR's Public Lands Archaeology program (PLA) are available to conduct an archaeological reconnaissance survey and provide management recommendations.
3. Undocumented archaeological sites and historic structures must be reported to the Florida Master Site File (FMSF) as soon as possible. Please work with Florida Park Service Archaeologist Bill Stanton and the FMSF to complete the requisite documentation.
4. Staff from DHR's Research and Conservation Laboratory are available to advise and make recommendations for properly curating the park's collections.
5. Based on FMSF records, the majority of sites listed on Table 6 (pg. 53–56) are listed on the National Register of Historic Places as contributing sites to the National Register District AL04856. The exceptions to this are AL05635 and AL05685, which have not been evaluated.

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6. With regard to the goal "Protect, preserve and maintain the cultural resources of the park" (pg. 67-72 and Table 9, Goal VI):
  - a. 12 actions are listed under Objective B, on pg. 69, but only 7 of these appear in Table 9.
  - b. Action 2 of Objective B is to conduct a "level 1" archaeological survey of priority areas. While we agree that additional survey is needed, this terminology is not consistent with that used by cultural resource management professionals and it is therefore unclear what the parameters of this project would be. Please refer to Module 3 of DHR's [cultural resource management standards and operations manual](#), which details the scope of archaeological fieldwork of varying intensities (e.g., archaeological reconnaissance survey, phase I survey, phase II testing) and adjust the wording accordingly.
  - c. Objective C, Action 1: "regular monitoring of all cultural sites" must occur on at least an annual basis.

Please let us know if you have any questions or concerns regarding these comments. Thank you again for inviting us to participate and for your diligence in preserving, promoting, and interpreting Florida's cultural heritage.

Sincerely,



Jason O'Donoghue  
Archaeologist III  
Public Lands Archaeology  
Bureau of Archaeological Research  
Division of Historical Resources