

FORMAL PUBLIC COMMENT

Objection to FDOT's Proposed Acquisition and Use of Southworth Parcel for Borrow Pit

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Why FDOT Should Halt Southworth Site Acquisition

Opening Statement

The Florida Department of Transportation (FDOT) has repeatedly claimed that it follows stricter environmental standards than private applicants. However, its actions regarding the Southworth site tell a different story. FDOT is now **purchasing a 344-acre sand mine/borrow pit** in one of Florida's most environmentally sensitive regions — **an Outstanding Florida Spring Priority Focus Area (OFS/PFA), a Basin Management Action Plan (BMAP) zone, and a FEMA-designated Special Flood Hazard Area** — it seems **without updated environmental review, and potentially without any modern aquifer vulnerability or flood risk analysis.**

This formal comment details serious concerns across five categories, including geotechnical risks, aquifer vulnerability, misleading public engagement, and regulatory evasion. These risks are not theoretical. FDOT's own consultant has already warned of **sinkhole hazards, unconfined aquifers, and excavation into the groundwater table.** Moving forward with this site — as FDOT appears to be doing — **exposes the State, taxpayers, and Kings Bay to permanent and unmitigable harm.**

I. Misleading Public Process and Lack of Transparency

At the October 9, 2025 FDOT open house, FDOT representatives — including Anil Sharma and Tiffany Crosby — told the public that the **Southworth property** and its wetlands were only beginning **to be evaluated over the next 30–60 days**.

However, the record is clear: **FDOT appears to have been directly engaged in commissioning geotechnical work for the Southworth site in March 2025**, months before the public was told any review had begun. **TestLab, FDOT’s consultant, issued a full report on March 3, 2025** addressed to FDOT’s contractor, Superior Construction, under official FDOT Project #442764-2-52-01. Despite its significance, this report was not visible to the public until it appeared in the SWFWMD ERP file on August 11, 2025 — more than five months later.

What makes this even more troubling is that it appears the **State was actively assisting a private entity in advancing its Environmental Resource Permit (ERP)**, only to then turn around and move to purchase the property itself. At the October 9, 2025 open house, FDOT’s Teresa Driskell even stated that Southworth’s permit was expected to be approved — yet now the State is acquiring the site outright. Why? The most reasonable explanation is that Southworth could not overcome the land use hurdles at the County level, where the **Special Master had already ruled against the project**. This sequence of events gives the appearance of the State stepping in to bypass local denial, an underhanded approach that undermines transparency, accountability, and the public’s trust.

It is outrageous that five months ago FDOT had already identified the Southworth site as a “Future Borrow Pit,” and yet at the October 9 open house FDOT told the public that review of the property was only just getting underway. FDOT never disclosed its role in commissioning the March 2025 geotechnical work; that involvement only became

evident when the documents surfaced in the ERP file and were discovered by the public months later. This lack of disclosure deprived residents, agencies, and decision-makers of timely knowledge that should have been part of an open, transparent process. **This procedural evasion undermines public trust, raises legal concerns under §338.223, F.S., and suggests FDOT was advancing acquisition and permitting strategies behind the scenes before citizens had any chance to weigh in.**

I.A. Procedural Loophole – A Shift in State Narrative – From Denial to Purchase

On September 23, 2025, Citrus County quietly adopted **Resolutions 2025-070 through 072**, allowing **unelected staff to sign permits and agreements with FDOT, SWFWMD, and FDEP without public hearings or BOCC approval and without use of the County Seal.**

These sweeping resolutions were passed without public notice of their implications and allowed staff to execute “**any and all instruments in connection**” with **permits, certifications, or approvals involving these three agencies** — even for controversial or legally unresolved projects.

This change in policy came just weeks after public outcry forced the cancellation of the August 12 BOCC hearing on the Southworth mine, and days before FDOT began finalizing its acquisition of the same site. At the time, the public was told the project had been halted. Yet these resolutions may have created a backdoor for continued permit coordination and site access behind the scenes, while the active ERP (#48405.000) remained in the applicant’s name.

While FDOT does not require County zoning approval once it acquires land, its permitting efforts often rely on coordination with local

governments for site access, certifications, stormwater design, and compliance verification. The timing and broad language of these resolutions raise serious questions:

- Did FDOT, SWFWMD, or FDEP request or influence this change in County policy?
- Did any permits, site visits, or agreements take place under the authority of these resolutions before or during FDOT's acquisition of the Southworth parcel?
- Was this procedural shift intended to bypass public opposition and regulatory scrutiny that had already derailed the private version of this project?

The public deserves to know whether FDOT engaged Citrus County under this new policy. This timing raises a serious concern: **were these resolutions crafted in coordination with FDOT or other agencies**, to enable continued pursuit of the Southworth site outside of public view? If so, responsibility does not rest solely with Citrus County — FDOT, SWFWMD, and FDEP all bear accountability for undermining public trust and bypassing local safeguards.

II. Karst Terrain, Sinkhole Risk, and Aquifer Threats

TestLab, Inc., FDOT's own geotechnical consultant, issued a clear warning on **page 5** of its March 2025 report:

“The site is underlain by limestone bedrock that is susceptible to dissolution and the subsequent development of karst features such as voids and sinkholes in the natural soil overburden. Construction in a sinkhole prone area is therefore accompanied by some risk that internal soil erosion and

ground subsidence could affect the mine expansion in the future. It is not possible to investigate or design to completely eliminate the possibility of future sinkhole related problems. In any event, the Owner must understand and accept this risk.”

TestLab's/FDOT's March 2025 report makes clear that the Southworth **site carries unavoidable geotechnical risks**. The limestone bedrock is prone to dissolution, creating voids and sinkholes that can destabilize the land. Internal soil erosion and ground subsidence could undermine both mine pits and surrounding property, and these risks cannot be fully investigated, predicted, or engineered away. Importantly, the report concludes that the “Owner must understand and accept this risk,” meaning that if FDOT acquires the site, these liabilities transfer directly to the State and its taxpayers.

The site is also located in an aquifer recharge zone. CES logs (e.g., HA-1, HA-3) and TestLab boring data show direct hydraulic connection between the surficial and Floridan aquifers, with no confining clay layer observed at several borings. Refusal depths recorded by TestLab (B-15 at 13 ft, B-16 at 10 ft, B-20 at 11 ft) confirm that excavation would intersect groundwater almost immediately, exposing it to oxygen and contamination pathways.

Excavating in karst terrain creates permanent disruption. Once aquifer conduits are breached, the impacts are irreversible:

1. **Karst vulnerability:** Dissolving limestone fosters voids that destabilize the surface and invite collapse.
2. **Sinkhole formation:** The report acknowledges ongoing risk of sinkholes that cannot be engineered away.

3. Soil erosion and subsidence: Ground settlement can undermine both the pit and adjacent land.

4. Aquifer and spring flow impacts: Excavation would intersect groundwater directly, introducing oxygen and contamination into a system connected to the Crystal River/Kings Bay Outstanding Florida Spring.

Excavating here creates non-restorable risks to the aquifer, spring flow, and water quality — risks that cannot be mitigated.

III. Sand Volume Claims Are Not Supported by Borings

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FDOT and the applicant claim the Southworth site could supply **3.5 to 4.5 million cubic yards of sand** for Suncoast 3A. The **boring data does not support this figure:**

- The mine area is only 150 acres,
- Refusal depths recorded by TestLab are as shallow as 10–13 feet (e.g., B-15 at 13 ft, B-16 at 10 ft, B-20 at 11 ft),
- ERP rules (Vol II §5.4.1) require maintaining a 2-ft buffer above limestone, and
- Achieving the claimed yield would require excavation to 14–18 feet, which is not geotechnically feasible in this terrain without breaching karst limestone.

The refusal data suggests the site could not safely yield even half of the sand volume claimed. More importantly, any attempt to “scale

down” the excavation still leaves the unavoidable fact that this site sits in karst terrain, with direct aquifer connection and high sinkhole risk. In short, this site is geologically unsuitable for sand mining of any scale, and efforts to force extraction here would carry unavoidable risks to both the aquifer and the Parkway project itself.

IV. Groundwater Table and “GNA” Notations

TestLab, FDOT’s own geotechnical consultant, repeatedly marked borings as “**GNA**” – **Groundwater Not Apparent**. “GNA” is not a scientifically valid determination in a known recharge area for groundwater. TestLab’s April 18, 2025 report does acknowledge groundwater observations in some borings — **confirming shallow groundwater** in line with CES data at 6–7 feet below grade.

Shallow groundwater was in fact observed in the same dataset, and TestLab records show that excavation would intersect groundwater almost immediately, triggering dewatering impacts. For FDOT to purchase this property with a known shallow water table adds to the **enormous hydrogeological risks to the State and its taxpayers**.

The presence of groundwater at such shallow depths magnifies the risks of mining this site. **Excavation into the water table would immediately expose groundwater to oxygen, altering its chemistry and accelerating dissolution of the underlying limestone. This can increase the likelihood of sinkhole collapse and open direct pathways for contaminants to enter the Floridan aquifer.** Because the site is in an aquifer recharge area and within the Priority Focus Area for the Crystal River/Kings Bay Outstanding Florida Spring, these impacts would not remain localized — they would flow outward through the aquifer system, affecting spring flow and regional water quality. Unlike surface impacts that can sometimes

be filled or re-graded, once groundwater is exposed and altered, the damage cannot be reversed or effectively mitigated.

V. OFS / PFA and BMAP Protections

FDOT is now moving to acquire the Southworth property for use as a borrow pit, even though the site lies within the **Kings Bay / Crystal River Outstanding Florida Spring (OFS) Priority Focus Area (PFA)**. By law, this designation carries additional protections under:

- **§373.802–.813, F.S.** (Outstanding Florida Springs program), and
- The **Kings Bay Basin Management Action Plan (BMAP)**, which requires nutrient reduction and recharge protection.

Despite these requirements, it has been extremely difficult to locate FDOT documents that address these protections. The **1998 Environmental Impact Study (EIS)**, which FDOT continues to rely on, is now **decades out of date**, and it is unclear how such an old study remains legally valid in light of modern regulatory protections and standards. Subsequent re-evaluations are difficult to locate and do not appear to be easily accessible on the FDOT site, and the August 2024 update itself does not reference the OFS/PFA or BMAP framework. Together, these gaps raise serious questions as to whether spring protections have been properly applied to this property at all.

This is especially concerning given the condition of the Kings Bay spring system. **Historic flows have dropped by more than 50% since the 1970s**, with lows in the 2000s–2010s reaching only 175–210 million gallons per day. **Millions of taxpayer dollars have already been spent on Kings Bay** restoration projects to reduce nutrients and restore seagrass. **Allowing excavation within the PFA**

would undermine those investments, accelerating aquifer disruption and nutrient loading in one of Florida's most fragile first-magnitude springs.

VI. Taxpayer Risk and Financial Secrecy – Undisclosed Purchase Price and Unjustified Public Expenditure

If valued modestly at **\$65,000 per acre**, consistent with Florida borrow pit market rates, the proposed FDOT acquisition of the **344-acre** Southworth sand mine would total **\$22.36 million**. Even at a discounted **\$50,000 per acre**, the total would exceed **\$17.2 million** in taxpayer funds.

This level of investment is alarming for a site that:

- **Sits within a FEMA-designated Special Flood Hazard Area (SFHA)**, where base flood elevations range from **8.6 to 12.8 feet NAVD**, while the proposed excavation depth drops as low as **2.3 feet NAVD**, creating clear flood and recharge vulnerability;
- **Lies within the Kings Bay Outstanding Florida Spring (OFS) Priority Focus Area**, designated by the State of Florida for aquifer protection and nitrate reduction under the BMAP program;
- And where TestLab's own geotechnical investigation identified significant **karst risk**. As stated in their engineering report:

"The site is underlain by limestone bedrock that is susceptible to dissolution... There is a risk that internal soil erosion and ground subsidence could affect the mine expansion in the future. It is not possible to investigate or design to completely eliminate the possibility of future sinkhole-related problems."

Despite these risks, there is **no evidence of a competitive bidding process, no demonstrated sand shortage** for Phase 3A construction, and **no meaningful updated environmental review for phase 3A has been** provided to the public. In fact, according to District Seven Secretary Justin Hall, FDOT **saying**, “They’ve been able to source the material,” he said. “I personally think the issue’s been addressed by the contractors.”

Florida taxpayers deserve accountability. Before any further action is taken, FDOT and FTE must:

- Justify the valuation and acquisition of a site in such a vulnerable area,
- Disclose all financial terms and mass diagrams that led to this selection,
- Provide comparative analysis of other available borrow sources,
- And explain why a site with these hydrologic, structural, and environmental concerns is being prioritized for public investment.

The public has a right to know: Why is the State fast-tracking a risky acquisition for mining without transparency, competitive sourcing, or price justification?

This level of secrecy is unacceptable when tens of millions of public dollars are at stake.

FDOT’s Policy Contradictions

FDOT’s own published procurement and sustainability policies emphasize transparency, environmental stewardship, and fiscal

accountability. Yet these principles appear to be ignored in the proposed acquisition of the Southworth site:

- **Procurement Transparency:** FDOT's Procurement Policy Manual states that all purchases over \$35,000 must follow competitive solicitation unless specifically exempted. The Southworth land acquisition, estimated between \$17–22 million, and yet we were told no bidding process, comparative cost analysis took place. This bypasses the public justification process.
- **Sustainability Commitments:** FDOT's Office of Environmental Management promotes sustainability and resilience, stating: "**FDOT shall prioritize avoidance of impacts to natural resources and promote mitigation hierarchy principles to minimize long-term environmental damage.**" Choosing a site located in a FEMA floodplain, a Priority Focus Area for the Kings Bay Outstanding Florida Spring, and with documented karst risks, directly contradicts these stated goals.
- **Public Trust:** The Florida Transportation Plan (FTP) calls for "**efficient and responsible investment of public resources.**" Yet this transaction lacks public disclosure of the purchase price, and needs justification, or environmental re-evaluation.

Conclusion

FDOT should not proceed with acquisition of the Southworth site. The property lies within a FEMA floodplain and the Kings Bay Outstanding Florida Spring Priority Focus Area—an area designated for protection due to its critical role in aquifer recharge and spring flow. Excavation here poses irreversible harm to water resources and risks undermining decades of restoration work and millions of taxpayer dollars already invested to protect Kings Bay.

Proceeding with this acquisition—without competitive bidding, public justification, or a meaningful updated environmental review—further compounds the danger. The public has not been shown any sand shortage for Phase 3A construction, yet tens of millions in taxpayer funds may be committed to a site with known flood, karst, and spring vulnerability risks.

Ignoring these legal, environmental, and financial red flags is unacceptable. FDOT and FTE must halt the acquisition and begin a transparent reassessment process that honors Florida law, protects our water, and respects public trust.

Conclusion and Request for Action

We respectfully request that FDOT and FTE immediately halt all efforts to acquire or mine the Southworth site. Instead:

- Use one of the many pre-approved alternative borrow pits,
- Conduct a new SEIR specific to karst, aquifer, and OFS/PFA conditions, and
- Honor the Citrus County Special Master's ruling and overwhelming public opposition.

This site is too environmentally fragile, too procedurally flawed, and too dangerous to the aquifer and springs to justify any public investment.

Public Records Request – Chapter 119, F.S.

Pursuant to Florida's Public Records Law, I respectfully request the following:

1. All geotechnical boring logs, boring location plans, worksheets, reports, and related correspondence generated under **FDOT Project #442764-2-52-01 (SR 589, Suncoast Parkway 3A)**, including but not limited to files referencing:
 - *"ABORRD_FillXploreBoreLocation_01.dgn"* (as shown on the 2/28/25 and 4/18/25 worksheets),
 - TestLab, Inc. reports submitted March 3, 2025, and April 18, 2025,
 - Any related FDOT, Volkert, or Superior Construction files.
2. A copy of the full August 2024 **State Environmental Impact Report (SEIR)** for Suncoast Phase 3A, including appendices and geotechnical data.
3. Any internal communications, memos, or reports between FDOT, FTE, Volkert CEI, or Superior Construction regarding:
 - Karst or aquifer vulnerability at the Southworth site,
 - FEMA floodplain data or compensatory storage requirements,
 - Basin Management Action Plan (BMAP) or Outstanding Florida Spring (OFS) compliance,
 - Use of toll revenues or justification for bypassing alternate borrow pits.

- Any FDOT internal or consultant communications regarding the site's suitability for borrow pit use.
- 4. The legal basis for continuing to rely on the 1998 SEIR and 2020/2023 re-evaluations without new analysis of BMAP, OFS/ PFA, or FEMA SFHA impacts.
- 5. All cut-and-fill calculations and mass balance diagrams prepared for Suncoast Parkway Phase 3A, including any documentation of embankment volume requirements and fill needs.
- 6. Confirmation of any identified borrow pit deficits for Phase 3A, including internal memos or consultant reports justifying the need to open a new borrow pit in the Kings Bay OFS Priority Focus Area and Special Flood Hazard Area.
- 7. All project files associated with:
 - FPID 405270-1-32-01
 - FPID 405270-3-32-01
 - FPID 405270-4-32-01

as referenced in the August 2024 SEIR for Suncoast Parkway Phase 3A.

Please confirm receipt and provide the expected time of response. If portions are exempt or delayed, please cite the specific exemption under Florida law. If this comment must be submitted elsewhere to be recorded in the ERP or State file, please advise.

Respectfully,

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