

Thank You – and Major New Revelations About the Borrow Pit

Dear Friends and Neighbors,

Thank you to everyone who attended last week's FDOT open house. Your presence mattered. We heard officials admit they were surprised at how informed and prepared our community is on the borrow pit issue. That is a credit to each of you who has taken time to learn, speak out, and stand together.

We now have **confirmed new information** that makes our case even stronger. This is information we are actively sharing with you the public, agencies, elected officials, and the media:

Why FDOT Should Halt Southworth Site Acquisition

FDOT is acquiring land in one of Florida's most environmentally sensitive zones — a 344-acre parcel that sits inside the Kings Bay/Crystal River Outstanding Florida Spring Priority Focus Area, a FEMA-designated floodplain, and a Basin Management Action Plan zone — with no apparent evidence of updated environmental review or aquifer risk modeling.

FDOT claims to follow higher environmental standards, yet this case suggests the opposite: procedural evasion, misleading public statements, and disregard for spring protections.

I. Misleading Public Process

Despite telling the public on October 9 that they were only beginning to evaluate the Southworth site, FDOT had already commissioned full geotechnical work back in March 2025 — through a report addressed to FDOT contractor Superior Construction under official Project #442764-2-52-01.

That report was hidden from public view until it appeared in the permit file five months later, and only after citizens uncovered it. FDOT never disclosed its involvement in what appears like an effort to help advance the Southworth environmental resource permit behind the scenes. This sequence gives the appearance of FDOT stepping in to bypass local denial of the mine.

II. Sinkhole and Aquifer Risks

FDOT's own hired consultant, TestLab, warned clearly:

“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.”

Boring logs show excavation will immediately intersect the groundwater table, with no confining clay layer to protect the Floridan aquifer. Risks include:

- Sinkhole collapse
- Irreversible aquifer exposure
- Groundwater contamination
- Permanent damage to Kings Bay spring flow

III. Sand Yield Claims Don't Match Reality

FDOT claims this site will yield 3.5 to 4.5 million cubic yards of sand, but borings show refusal depths of just 10–13 feet in many places. ERP rules prohibit digging into limestone — meaning the claimed yield is geologically impossible to achieve safely.

The site likely cannot deliver even half the promised sand — making the risks even harder to justify.

IV. Groundwater Exposure

FDOT's TestLab's April 18, 2025 report acknowledges groundwater observations in some borings — **confirming shallow groundwater** in line with CES data at 6–7 feet below grade. 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. Violations of Spring and BMAP Protections

This site falls inside the Outstanding Florida Spring Priority Focus Area (OFS/PFA) — which is protected under §373.802–.813, Florida Statutes — and inside the Kings Bay Basin Management Action Plan (BMAP), which requires nutrient controls and recharge safeguards.

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 for the 3A phase of the Suncoast Parkway that we received from FDOT does not reference the OFS/PFA or BMAP framework.

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

The Bottom Line

FDOT is about to purchase a borrow pit that:

- Lies inside a protected spring zone,
- Has known karst and sinkhole risks,
- Would intersect groundwater directly,
- And cannot safely yield the sand claimed.

This isn't just a bad project — it's a direct threat to Kings Bay, the aquifer, and public trust.

Land Value and Deal Transparency

We've confirmed that FDOT paid approximately **\$2.2 million for just 50 acres** of right-of-way (ROW) land from Southworth — roughly **\$44,000 per acre**. Another nearby landowner, was reportedly paid **\$17,000 per acre** for similar right-of-way use.

But this latest acquisition is **not just for ROW** — it's to **purchase 344 acres** of the proposed Southworth sand mine location. That's a very different valuation number.

If FDOT values the land based on its utility for **active sand mining**, then a moderate per-acre rate of **\$65,000** — consistent with regional borrow pit pricing — would place the total purchase

around **\$22.36 million**. Even a lower estimate of **\$50,000 per acre** would total **\$17.2 million**.

Despite these enormous taxpayer costs, we have no information on **FDOT's purchase price, whether mineral rights are included, or whether any of the major environmental limitations have been factored in**. There is also no evidence of a public bidding process or competitive sourcing evaluation. We were told at the open house on October 9th, that FDOT purchased no other borrow pits for the Suncoast highway and no other sites were considered for sand because this site allowed for less “trucking” of the sand — but at what cost to our water?

As far as we know, this deal **has not yet closed**, but transparency is severely lacking. The public deserves to know **why the state would spend tens of millions** to mine a fragile, flood-prone, aquifer-sensitive site that comes with many risks per FDOT's own reports.

What We're Asking FDOT to Do

We have submitted this as a formal public comment. We are urging FDOT to:

- Cancel the acquisition of the Southworth property,
- Conduct a new SEIR focused on aquifer, floodplain, and spring protections, and
- Use one of the many already-permitted borrow pits elsewhere in the region.

Other Serious Questions

- Why did FDOT ignore its past practice of using pre-approved borrow pits?
- Why spend taxpayer money on the only directly purchased borrow pit for the Parkway — one with red flags all over it?
- Why sell leftover sand from Phase 2, then quietly plan this risky deal for Phase 3A?

How You Can Help

We've put together a press release with all the details. (Attached)
To protect our springs and water, we need to get this story into the hands of major media outlets across Florida.

Please help us by:

- Forwarding the attached release to newspapers, TV stations, radio, or reporters you know,
- Sharing it with friends and community groups,
- Posting it online where more people will see it.

The more eyes on this, the harder it will be for FDOT to push this through quietly.

Thank you for standing with us. Together, we are making a difference.

With gratitude,
Stop the Sand Mine Committee Colleen Farmer, Tony Ayo and David Bishop