

Dear Friends and Supporters,

We want to start by saying **thank you.** 

This past week has been incredibly busy and incredibly encouraging. Our volunteers spoke with hundreds of people at the Manatee Festival, educated residents about the proposed sand mine and FDOT borrow pit plans, and helped raise funds through bumper-sticker sales. Saturday was a great success, and while Sunday's weather cut things short, the level of public support we saw is inspiring. Thank you to everyone who showed up, donated, shared information, and helped spread the word.

We are also actively speaking with reporters and meeting with news outlets, and we recently had a major article published in the *Citrus County Chronicle* highlighting serious concerns about groundwater safety after last fall's excavation incident along the Suncoast Parkway.

But while public outreach has been moving fast, **so have changes inside the permit process.** That is why many of you have seen us submitting new public comments this month.

We want to explain what is happening and why it matters.

Problem #1: A 90-Day Permit Extension Was Granted Without a Proper Request in the Public Record

In September, SWFWMD issued a formal Request for Additional Information (RAI) on the Southworth ERP (Environmental Resource Permit). That letter clearly stated that **any extension**

of the deadline must be requested in writing and must include justification.

However:

- No written extension request appears in the public ERP file.
- No written justification appears in the public ERP file.
- The only reference is an email from the applicant's consultant in December asking, "*Did you get the request for an extension?*" — without stating when, how, or why an extension was needed.
- Nevertheless, a **90-day extension was granted on January 13, 2026, nearly four weeks later and only after renewed public inquiry**. While District staff may have discretion to grant informal extensions, the public ERP record does not reflect a written request or any justification, and it does not clearly document the timing or basis of the extension decision. This prevents the public from meaningfully tracking procedural status and raises serious transparency concerns.

Why does this matter?

Because when deadlines are extended without documentation, the public cannot track what is happening, when decisions are being made, or why. Transparency is not optional in public permitting, it is essential to public trust and legal accountability.

Problem #2: No One Can Clearly Say Who Actually Owns or Controls the Property

Even more concerning: **the public record now contains multiple, contradictory statements about who owns this land and who is legally responsible for the project.**

Here is what the record currently shows:

- Recent ERP letters, including the extension approval, list the applicant as the **George L. Southworth Revocable Trust**.
- In July 2025, the applicant's consultant told SWFWMD the land had been transferred to **3KS Family, LLLP**, and asked that the permit record be updated.
- In December 2025, the applicant's consultant advised the District that, ***"Applicant had turned over the project to FDOT, who said they planned to BUY his land and finish the permit. However, now they want the applicant to finish it."*** This statement reflects not only shifting project control, but also uncertainty over whether the permit would be completed by a private landowner or a state transportation agency a distinction that has major legal and regulatory consequences for permit eligibility, project purpose, and required environmental review.
- Meanwhile, **Citrus County property records list the owner as Midwest Systems, Inc. and associated individuals**, under Parcel ID 17181200003000000000 at 6580 W. Cavalry Lane.
- County staff reports also state that part of the site (known as **Parcel 30000**) exists by deed but is **not recognized by the Property Appraiser**, and that a **plat exception involving Midwest Systems is still pending and not approved**.

Yet despite all of this, the ERP file continues to list the Trust as the applicant, with no documentation resolving who actually has legal control of all the parcels involved.

Why this matters:

Under Florida law, an Environmental Resource Permit **must be issued only to the party with legal control of the property and legal responsibility for compliance.** If ownership and control are unclear, the permit should not move forward. These same parcel and plat issues also affect whether **Citrus County could ever lawfully approve land-use changes** at the site.

In simple terms:

If no one can clearly say who owns the land and who controls the project, **no permit should be advancing.**

Problem #3: FDOT Cannot Simply Take Over a Private Mining Permit

If this ERP were issued to a private party and later used by FDOT for a state transportation borrow pit, that would be a **completely different project and a completely different applicant** than what is currently under review.

That would require:

- A new ERP application
- New proof of legal control
- New environmental analysis
- New public participation

Using a privately reviewed permit to support a state transportation project would bypass safeguards that are supposed to protect communities and water resources when large public infrastructure projects are proposed.

What the Citrus Chronicle Reported and Why It's Important

On January 19, the *Citrus County Chronicle* published an article titled:

“Advocates question groundwater safeguards after Parkway dig”

The article describes what happened when an excavator broke into groundwater during construction of a stormwater pond along Suncoast Parkway Phase 3A last October. The machine was flooded and had to be removed by crane.

Why this matters:

- The site sits inside the **Kings Bay springshed**, where groundwater flows directly to the springs that support manatees, tourism, and drinking water.
- In karst terrain, underground disturbances can travel quickly through limestone pathways.
- Many nearby residents rely on shallow private wells.
- Despite water entering the excavation, **no independent hydrogeologic investigation has been publicly documented.**

- Water samples were reportedly taken, but **no sampling reports, locations, or results have been released.**

Even more troubling, the paper reports and Stop the Sand Mine found information under the Environmental Resource Permit for the SunCoast Parkway project, geotechnical boring data that advised that organic soils at the site **should not be removed** yet excavation went forward anyway, groundwater rushed in, and equipment became stuck.

The Committee is calling for an **independent technical investigation**, not an internal agency review, including:

- Subsurface failure analysis
- Evaluation of groundwater connections to springs
- Long-term groundwater monitoring
- Additional borings to assess limestone stability
- Tracer or dye studies to track flow paths

None of this has been publicly documented since the incident.

What About Now That the Hole Has Been Filled?

Since the incident, the excavation has been backfilled and the area is now being completed as part of a stormwater pond. In theory, it **is possible** to repair an excavation that intersects groundwater without causing lasting aquifer harm, **but only if the repair is treated as an engineered groundwater and karst-stability incident, not as routine construction.**

In highly permeable sand over limestone, like the soils documented at this site, groundwater inflow can indicate very high hydraulic conductivity, raveling sands, or preferential pathways at the sand-limestone interface. If such conditions are simply filled without documented engineering controls, the repair can leave behind:

- Persistent seepage pathways between surface water and the aquifer,
- Ongoing internal erosion or “piping” of fine sands,
- Chronic turbidity, and
- Long-term settlement or collapse risks that may not appear immediately.

To be considered protective in a springshed and Outstanding Florida Spring Priority Focus Area (OFS/PFA), a defensible repair would normally include documented removal of unsuitable material, placement of clean compatible fill in controlled lifts, compaction testing, filtration or separation controls to prevent fines migration, and post-repair monitoring to confirm stability and groundwater behavior. If this documentation exists we ask that the agencies publicly release it because without publicly available engineering reports, material certifications, compaction records, or groundwater follow-up data, there is no objective basis for residents to know whether the backfill restored natural hydraulic conditions or simply covered over a potential long-term vulnerability in the aquifer system.

This concern is heightened by the fact that agencies have not acknowledged the site’s location within the Kings Bay springshed and OFS Priority Focus Area, areas where even small changes in groundwater pathways can have disproportionate downstream impacts on springs and connected waters.

In short, while safe repair is technically possible, **it cannot be assumed** in a karst springshed without documented engineering controls and follow-up monitoring. Treating this incident as routine construction rather than a groundwater breach leaves unresolved questions about long-term aquifer protection.

As the article explains, how agencies respond, including whether groundwater breaches can simply be filled and forgotten without documented investigation, could set precedent for how future projects near springs, wetlands, and aquifers are reviewed across Florida.

Why Your Public Comments Still Matter

Because of these ongoing procedural problems, shifting ownership claims, and unresolved environmental risks, **continued public participation is critical.**

Public comments:

- Become part of the permanent administrative record
- Can trigger additional agency review
- Preserve issues for potential legal challenges
- Force transparency when agencies would otherwise move quietly

We are not opposed to progress. We are opposed to **cutting corners in one of Florida's most sensitive groundwater**

regions especially when agencies already know this area is vulnerable.

Thank You and Please Stay Engaged!

To everyone who volunteered, donated, spoke with neighbors, signed petitions, or submitted comments, **you are making a difference.**

We will continue updating you as new developments occur, and we will share links to media coverage and public comment opportunities as they arise.

This is a long fight, but it is an important one, for Kings Bay, for our aquifer, and for the future of Citrus County.

With sincere thanks,

Colleen Farmer, Chair

Tony Ayo, Co-Chair

Stop the Sand Mine Committee

stopthesandminecc@gmail.com