



Alachua County Environmental Protection Department

Stephen Hofstetter
Director

May 8, 2025

Tara E. Howell, Director
Planning & Zoning Department
320 Mongo Street
Bronson, FL 32621

RE: Special Exception for Mining Operation on PN 0322100200, 11986 NE SR 24, Levy County, FL

The 99-acre subject property is located just 1.5 miles west of Alachua County on SR24 in an area where other mining operations exist. This area is also in the High Aquifer Recharge Area of the county where the Floridan aquifer is more vulnerable. We have received concerns from citizens both in Levy County and Alachua County about the potential environmental and traffic concerns in Alachua County related to this application and appreciate the opportunity to provide comments on this application.

Because of the sensitivity of this area, Alachua County has regulations and standards in Alachua County that help reduce the potential impact these types of operations could have on our drinking water and the Floridan aquifer and recommend that Levy County consider similar standards.

Based upon the Geotechnical Report prepared by Geotech, Inc. on May 17, 2024, the estimated seasonal high ground water table (ESHGWT) for this area was estimated to range from elevation 50.8 to 71.2 NGVD. The average ESHGWT was calculated to be at elevation 64.0. The proposal is to excavate to an elevation depth of 52, which is a foot above what the SWRWMD requires as a maximum, but well within the seasonal high ground water elevation for this area. Excavation to that depth increases the potential for fuel, oil, or hydraulic fluid discharges from the construction equipment and haul trucks into the ground water table. Maintenance of this equipment is typically carried out at the pit, where accidental discharges are not uncommon. Given that such incidents occur with some regularity, it's important to ensure that a documented incident response and notification plan is in place.

For mining operations in Alachua County where the Floridan aquifer is unconfined, excavation is limited to no deeper than fifteen (15) vertical feet above the top of the Floridan aquifer, to ensure that a minimum of fifteen (15) feet of undisturbed soil remains above the wet season high water table or limestone. We have data and analysis from operations in Alachua County that show this helps reduce potential water quality concerns, which we are willing to share with Levy County staff to help in their analysis of the application. Based on this requirement, Alachua County would require a maximum

excavation depth of 79 NGVD for this project. We strongly recommend that Levy County consider the same level of protection and consider limiting the excavation depth to 79 NGVD.

Under Alachua County regulations, the minimum setback from a mining operation to a potable water well is 500 feet. It appears that a neighboring residential well is located approximately 100' from the proposed mining area. With the mine depth reaching well within the ESHGWT, this increases the potential contamination concern for this adjacent property owner. We strongly recommend that you consider extending the western setback line to 500' to reduce the potential harm to the adjacent residential well.

Based on the concerns mentioned above and to demonstrate that the operation will not impact ground water, we recommend the following conditions be added to the Special Exception:

- Any groundwater reports required by the Water Management District or Florida Department of Environmental Protection (FDEP) shall be provided to the Levy County Planning & Zoning Department.
- The maximum mining depth should be no greater than 79 NGVD, 15 feet above the ESHGWT.
- An incident response and notification plan shall be provided to the Planning & Zoning Department to address potential contamination concerns from accidental discharges.
- A setback of 500 feet shall exist to any existing drinking water wells.

We appreciate Levy County's continued dedication to sound planning and the protection of our two County's shared water resources. Please reach out to me at shofstetter@alachuacounty.us if you have any additional questions or concerns.

Thank you,

A handwritten signature in cursive script that reads "Stephen Hofstetter".

Stephen Hofstetter