Objections To PSE22-0002
TARA APRIL SPECIAL EXCEPTION PERMIT
on Behalf Of The National Speleological Society, Inc

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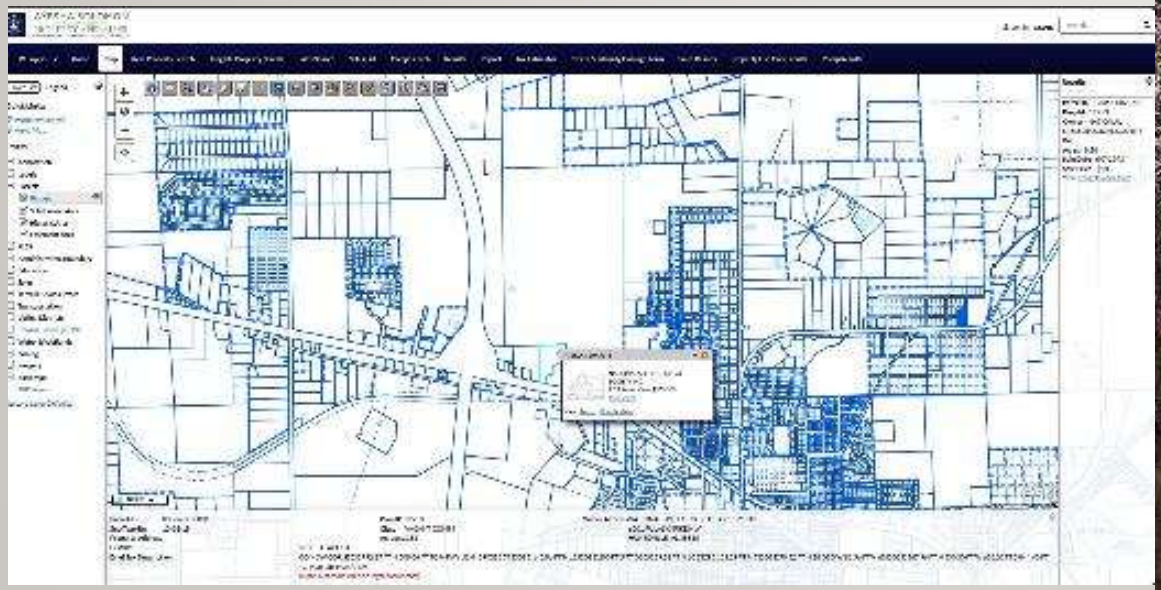
SUNSHINE CITY LAW

REQUESTING DENIAL OF TARA APRIL SPECIAL EXCEPTION PERMIT

- Application fails to meet threshold procedural requirements for a special exception and must be considered as part of the Tara development plan
- Minor Utility inappropriate vehicle
- Fails to meet Special Exception criteria
- Unsupported by adequate data and analysis.
- Internal inconsistencies with Comprehensive Plan

WHO IS THE NATIONAL SPELEOLOGICAL SOCIETY?



MILL CREEK SINK NATURE PRESERVE MANAGEMENT PLAN

The following Preserve Management Plan was adopted by the Board of Governors of the National Speleological Society to define management of Mill Creek Sink Nature Preserve (Alachua County, Florida). The intention of this plan is to protect the property and promote good relations between the NSS and neighboring landowners. Please observe the rules and encourage others to do the same so that this unique and outstanding cave may be enjoyed by all. Contact the NSS Property Managers at MillCreekPreserve@caves.org if you have any questions or need to request special arrangements.

Section 2.4.4(D) of the City's Land Development Regulations (LDRs), *Special exception standards*. A special exception permit shall be approved only upon a finding the applicant demonstrates all the following standards are met:

- (1) Complies with use specific regulations.
- (2) Compatibility.
- (3) Design minimizes adverse impact.
- (4) Design minimizes environmental impact.
- (5) Roads and other public facilities.
- (6) Not injure neighboring land or property values.
- (7) Drawings.
- (8) Complies with all other relevant laws and ordinances.

THOMAS R. SAWICKI, PH.D.

- Florida Agricultural and Mechanical University. Department of Biological Sciences Associate Chair for Graduate Studies. August 2021–Present.
- Ph.D. Ecological Sciences, May 2004, Old Dominion University, Department of Biological Sciences, Norfolk, VA. GPA 3.99.
- B.S. Biology, May 1998, Eastern Connecticut State University, Department of Biology, Willimantic, CT. GPA 4.0.

DR. SAWICKI LETTER, NOVEMBER 15, 2025

- "…it is my scientific opinion that placing a stormwater management facility near Mill Creek Sink poses a substantial ecological risk. The introduction of untreated or partially treated runoff—containing sediment, nutrients, pollutants, microbial contaminants, or chemical residues—has the potential to alter the biological, chemical, and microbial integrity of a uniquely sensitive and poorly understood groundwater ecosystem. Importantly, because the biodiversity of this system has historically been underestimated, the true extent of potential harm is likely greater than existing published literature suggests.
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- In conclusion, the evidence strongly indicates that Mill Creek Sink is biologically significant, ecologically fragile, and insufficiently characterized to justify construction of stormwater infrastructure in close proximity. Until a comprehensive modern survey—including molecular analyses—is conducted, the precautionary principle should guide land-use decisions affecting this site."

8 STEPHEN BOYES, P.G

GeoSolutions Inc., Gainesville, Florida: President and Principal Hydrogeologist, September 1986 to March 2017

EDUCATION

B.A., Geology, University of South Florida, Tampa, FL 1974.A.A., University of South Florida, Tampa, FL 1972.Post-graduate work in groundwater geology, advanced hydrogeology, geophysics, coastal plain geology, computer programming, University of Florida, Gainesville, FL, 1977 and 1978. Course work in geophysics, groundwater geochemistry and clays, University of South Florida, Tampa, FL, 1983.

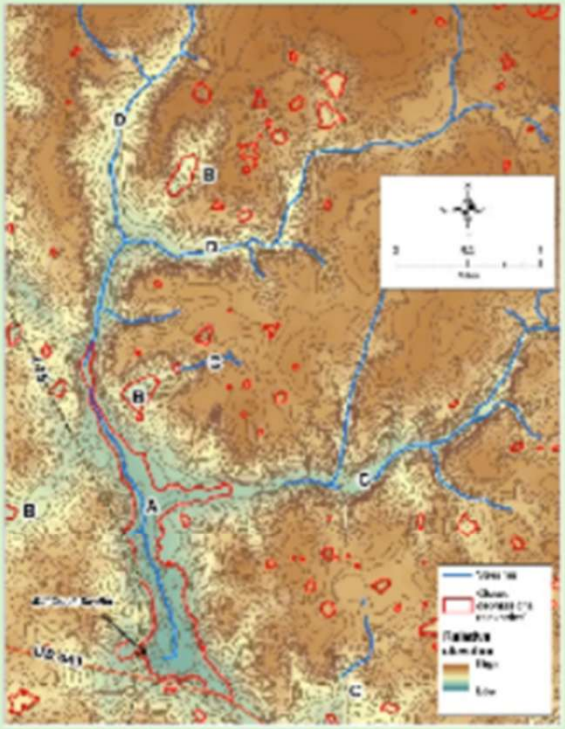
Mill Creek and Lee Sinks Dye Trace–Alachua County, Florida, July–December, 2005. Butt, P. L., S. Boyes, T. L. Morris, 2006.Prepared for Alachua County Environmental Protection Department under contract number 42189

Sidebar 12-5: HOW MUCH SEDIMENT HAS ENTERED MILL CREEK SINK CAVE?

We can estimate the volume of sediment that enters a cave over time by estimating the volume of the eroded watershed that drains into it. The figure to the right is a topographic map of the famous Mill Creek Sink in Alachua County. We will visit this sink in Chapter 24. For now, let's get a sense of how much sand and clay have entered the cave system as the sinkhole and drainage basin of Mill Creek have developed.

The Mill Creek drainage basin was once much larger and more complex. Sometime during the Pliocene or Pleistocene, a sinkhole developed at the location shown on the map as the Mill Creek swallet. Once that sinkhole developed and began to capture the flow in the creek, all the sediments eroded by the stream upstream of the swallet were either dissolved and entered the sink as chemical constituents or became sand and clay sediment that entered the cave.

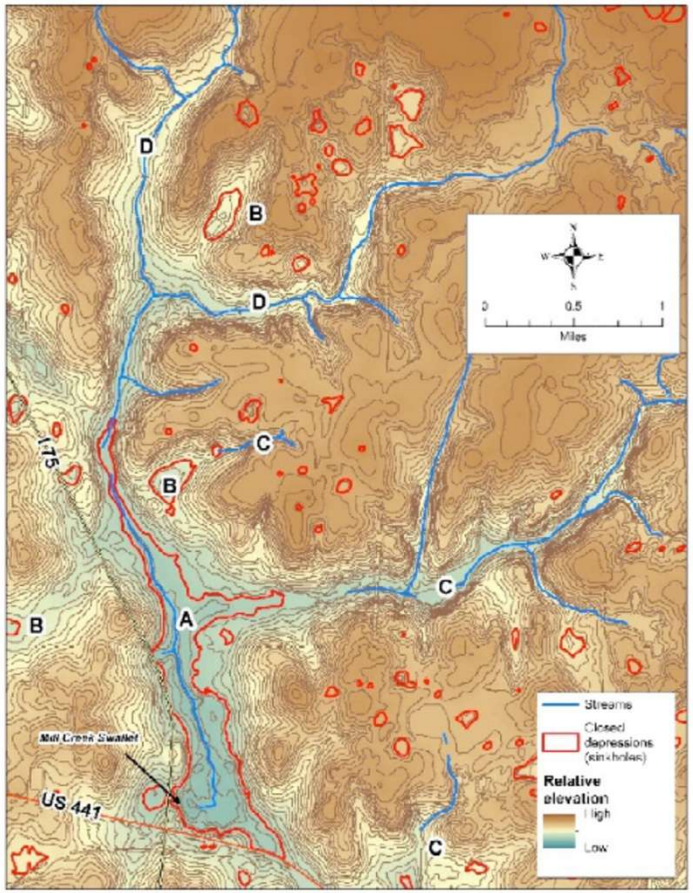
In a 2005 presentation to the Southeastern Geological Society, Sam Upchurch estimated the amount of this insoluble sediment that had gone underground. He assumed that the sediments and rocks upstream from the swallet were half carbonates, which dissolved, and half insoluble sand and clay. Based on measurements of the drainage basin volume, he estimated that the Mill Creek sinkhole and drainage basin once contained 12.6 million cubic yards of sediment, the insoluble part of which has entered the Mill Creek cave. Based on this estimate, approximately 634,000 20-yard dump trucks of sand and clay are currently found within the underlying cave system. Given the large number of caves with swallets and sinkholes in northern and central Florida, the amount of sand and clay trapped in caves of the upper Floridan aquifer has to be enormous.



Topographic map of the Mill Creek drainage basin and its many sinkholes. A is the closed depression (sinkhole) into which the creek drains. The other areas marked by B and outlined in red are also sinkholes. The stream segments shown by the letter C are parts of the Mill Creek drainage system that go underground before flowing to the main swallet. The stream segment marked by D is above the sinkholes that capture sediment.

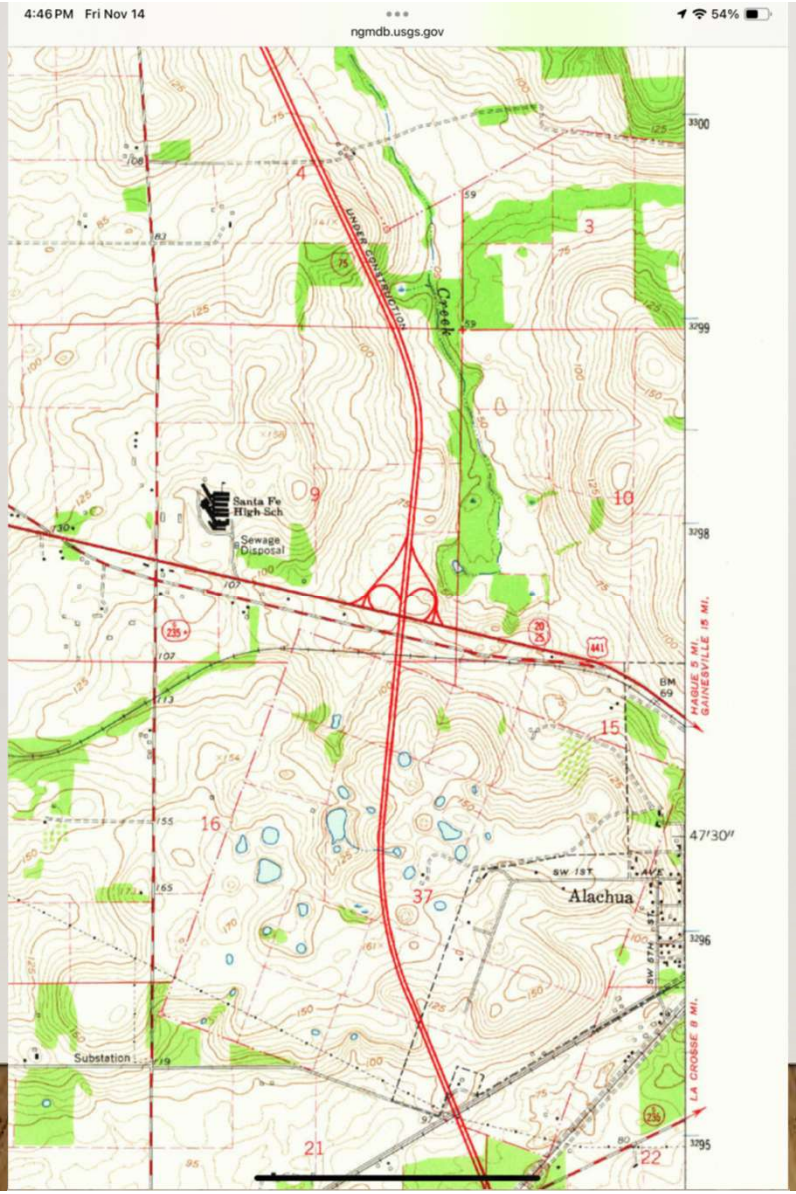
SRP Source: Personal communication from Upchurch 2025

Topographic map of the Mill Creek drainage basin and its many sinkholes.



Personal comunication Sam Upchurch, Sidebar 12-5, 11/14/2025 to Stephen R Boyes, P.G. Florida License PG184.

"A is the closed depression (sinkhole) into which the creek drains. The other areas marked by B and outlined in red are also sinkholes. The stream segments shown by the letter C are parts of the Mill Creek drainage system that go underground before flowing to the main swallet. The stream segment marked by D is above the sinkholes that capture sediment." Sam Upchurch 2025.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Santa Fe High Sch
Sewage Disposal
Creek
UNDER CONSTRUCTION
HAGUE 5 MI.
GAINESVILLE 15 MI.
LA CROSSE 8 MI.
Alachua
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SW 5TH AVE
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47'30"
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BM 69
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12 CONCLUSION: MUST DENY TARA APRIL

Tara April fails to meet the burden to support the criteria of Section 2.4.4(D) with competent substantial evidence

1) Complies with use specific regulations.

(2) Compatibility.

(3) Design minimizes adverse impact.

(4) Design minimizes environmental impact.

(5) Roads and other public facilities.

(6) Not injure neighboring land or property values.

(7) Drawings.

(8) Complies with all other relevant laws and ordinances.