

October 8, 2026

VIA EMAIL AND REQUEST FOR IMMEDIATE PLACEMENT IN ALL APPLICABLE PUBLIC RECORDS

Southwest Florida Water Management District
Environmental Resource Permit Bureau, Regulation Division
7601 U.S. Highway 301 North
Tampa, Florida 33637-6759

Lisa Foster, CFM, Pinellas County Floodplain Administrator
Pinellas County Floodplain Management
22211 U.S. Highway 19 North
Clearwater, Florida 33765

Barry A. Burton, Pinellas County Administrator
Jewel White, Pinellas County Attorney
Pinellas County Board of County Commissioners
315 Court Street
Clearwater, Florida 33756

Attention: Lee W. Hughes, P.W.S., Application 930235 environmental reviewer; Todd Boyle, Application 930235 engineering reviewer/contact; Cliff J. Ondercin, P.W.S., SWFWMD environmental manager; David Kramer, P.E., SWFWMD Environmental Resource Permit Bureau chief; Michelle K. Hopkins, P.E., SWFWMD Regulation Division director; Lisa Foster, CFM, Pinellas County floodplain administrator; Kelli Hammer Levy, Pinellas County Public Works director; Kevin McAndrew, Pinellas County Building and Development Review Services director; Jeremy Waugh, Pinellas County Utilities director; Cathie Perkins, Pinellas County Emergency Management director; Barry A. Burton, Pinellas County administrator; Jewel White, Pinellas County attorney; and Commissioners Dave Eggers, chairman; Chris Latvala, vice chairman; Chris Scherer; Brian Scott; Vince Nowicki; Kathleen Peters; and René Flowers

Re: Emergency Supplemental Notice of Actual Brooker Creek Overbank Conditions; Demand to Preserve and Calibrate Current Event Data; Renewed Demand for Watershed-Scale Hydraulic and No-Rise Review

Project: Brooker Creek Mitigation Bank

Application: ERP Application No. 930235 / Permit No. 47575.002

Related records: Application Nos. 889588 and 907654; Pinellas County DRM-24-00066

Dear Agency Officials and Elected Representatives:

I submit this emergency supplemental notice on behalf of myself and Save Tarpon Woods. It supplements, and does not replace or waive, the objections, evidence requests, and preservation requests previously submitted concerning Brooker Creek Mitigation Bank Application 930235 and the related application history. The purpose of this notice is immediate: Brooker Creek is presently over its banks along the eastern boundary of my property at 172 Annwood Road; at 2:00 p.m. on October 8, 2026, the official USGS gage height was 11.88 feet, only 0.12 foot, or approximately 1.44 inches, below the roadway-flooding level identified by Pinellas County; and additional heavy rainfall is forecast. The agencies now have a rare real-world event against which the applicant's assumptions, maps, elevations, drainage claims, and hydraulic conclusions can be tested. That evidence must be preserved and used before any approval is considered.

This is no longer a discussion confined to application narratives or colored polygons. On the morning of October 8, 2026, I personally observed Brooker Creek outside its normal channel and over its banks along my eastern property line. At approximately 8:30 a.m., I received an Alert Pinellas emergency message reporting a

Brooker Creek level of 11.7 feet, warning that roadway flooding may occur at 12.0 feet, advising Tarpon Woods residents to move vehicles to higher ground and avoid flooded streets, and stating that additional rain was forecast. The Alert Pinellas program is Pinellas County's official emergency-notification system.

USGS data independently match the County alert and show that the rise continued after it was issued. Station 02307359, Brooker Creek near Tarpon Springs, reported provisional gage heights of 11.70 feet at 8:30 a.m., 11.74 feet at 10:00 a.m., and 11.88 feet at 2:00 p.m. Provisional discharge increased from 204 cubic feet per second at 8:30 a.m. to 214 cubic feet per second at 10:00 a.m. and 253 cubic feet per second at 2:00 p.m. The 2:00 p.m. gage height was only 0.12 foot, approximately 1.44 inches, below the County's reported 12.0-foot roadway-flooding level. The 11.88-foot value is gage height above the station's reference datum, not creek depth. USGS separately reported the same water surface as 11.15 feet above NAVD 1988. Those values must not be compared with surveyed elevations or FEMA base-flood elevations without reconciling the applicable vertical datums. The NOAA National Water Prediction Service does not define an action stage or flood-stage category for this gage. Accordingly, this letter attributes 12.0 feet solely to the Alert Pinellas roadway warning and does not mischaracterize it as an official USGS or NOAA flood stage.

I. Contemporaneous public-safety evidence

Date and time EDT	Gage height	Discharge	Source and significance
Oct. 8, 12:00 a.m.	11.42 ft	143 ft ³ /s	USGS provisional series; start-of-day comparison
Oct. 8, 8:30 a.m.	11.70 ft	204 ft ³ /s	USGS provisional series; matches Alert Pinellas reported level
Oct. 8, 10:00 a.m.	11.74 ft	214 ft ³ /s	USGS provisional series; 0.26 ft below County roadway threshold
Oct. 8, 2:00 p.m.	11.88 ft	253 ft ³ /s	USGS provisional series; 0.12 ft below County roadway threshold

USGS marks all cited real-time readings provisional and subject to revision. The broader record shows a sustained event rather than an isolated short-term fluctuation. From 2:00 a.m. on October 7 to 2:00 p.m. on October 8, the gage rose from 9.27 to 11.88 feet, a 2.61-foot increase over 36 hours and an average of 0.0725 foot per hour. During the final 24 hours it rose 1.45 feet, averaging approximately 0.060 foot per hour; during the final 12 hours it rose 0.39 foot, averaging 0.0325 foot per hour. The series includes a sharp runoff pulse on October 7 followed by a slower but continuing rise, so none of these averages should be treated as a straight-line crest forecast. The agencies should preserve the full 15-minute provisional feed now and later add the finalized quality-controlled record.

The National Weather Service forecast generated at approximately 2:10 p.m. on October 8 kept a Flood Watch in effect through midnight and forecast showers and thunderstorms capable of heavy rain. The point forecast for the Tarpon Woods area called for 0.75 to 1.0 inch of additional rainfall during the afternoon and 1 to 2 inches overnight. The Tampa Bay forecast discussion warned that excessive runoff may flood rivers, creeks, streams, and low-lying areas and described event totals of one to three inches, with locally greater

amounts where training storms develop. These rainfall amounts are forecasts, not observed totals or a site-specific Brooker Creek crest prediction. No official Brooker Creek crest or threshold-crossing time had been issued. Hurricane Isaias was forecast to remain west of the Tampa Bay region, so this letter does not claim a direct Pinellas County landfall. The local flood concern exists regardless: Brooker Creek is already overbank, the measured gage remained on a continuing rise through 2:00 p.m., a Flood Watch is active, and additional local rainfall is forecast.

The present event does not prove that a project that has not yet been permitted or constructed caused today's flooding. It proves something directly relevant to permitting: the receiving system is demonstrably flood-sensitive under existing conditions, current conveyance is being stressed, actual observed water levels are available for calibration, and any proposal to alter vegetation, roughness, ditches, soils, grades, storage, access routes, fencing, or maintenance practices requires more than an unsupported assurance that no adverse effect will occur.

II. The current event is directly relevant to Application 930235

Pinellas County already placed this exact concern in the application record. Its December 19, 2025 agency comments stated that proposed tree removal and planting within the Brooker Creek floodplain or floodway may affect flood storage and conveyance and requested hydrologic and hydraulic analyses. The County separately asked whether the identified 13,359 trees and 3,179 shrubs, totaling 16,538 one-gallon plantings, would create net cut or fill and where displaced soil would be placed or removed. The comments also stated that approval by Lisa Foster, CFM, Pinellas County Floodplain Administrator, under Land Development Code section 158-221 would be required. Kelli Hammer Levy, Director of Pinellas County Public Works, transmitted those comments to SWFWMD and copied Kevin McAndrew, Director of Building and Development Review Services, and Jeremy Waugh, Director of Pinellas County Utilities. On December 22, 2025, SWFWMD reviewer Lee Hughes, P.W.S., forwarded the County comments to the applicant and directed the applicant to respond with its RAI response. Today's overbank condition makes a complete, technical response more urgent, not less.

SWFWMD's current Applicant's Handbook Volume II independently requires this analysis. Section 3.0 requires reasonable assurance that regulated work will not cause adverse water-quantity impacts, onsite or offsite flooding, or adverse effects on existing storage and conveyance. It specifically requires additional storm analyses when credible historical flooding evidence or limited downstream capacity shows that ordinary design assumptions may be inadequate. Section 3.1(f) calls for storage modeling or additional retention up to the 24-hour, 100-year storm for open basins with limited downstream conveyance capacity or retention storage. Sections 3.3 and 3.4 require floodplain-encroachment evaluation, equivalent compensating storage where required, use of the most accurate available data, and comparison of site-specific observed or measured elevations with modeled or existing-study data. Sections 3.7 and 3.8 protect historic basin storage and offsite drainage.

The official 2010 Brooker Creek watershed study commissioned by Pinellas County and SWFWMD likewise shows why a parcel-only conclusion is insufficient. Its Tarpon Woods analysis found that faster drawdown was contingent on adequate capacity between the subdivision and the Brooker Creek channel. The report recommended assessing drainage easements and rights-of-way throughout the watershed because important conveyances were not protected or accessible for maintenance. Current overbank conditions reinforce the need to analyze the connected system, drainage-easement capacities, obstruction risks, maintenance access, and upstream and downstream effects together.

Federal and local floodway standards point in the same direction. Under 44 C.F.R. section 60.3(d)(3), a participating community must prohibit encroachments within an adopted regulatory floodway unless hydrologic and hydraulic analyses performed according to standard engineering practice demonstrate that the encroachment will cause no increase in flood levels during the base-flood discharge. Pinellas County Code section 158-221 generally prohibits development in the 100-year and 25-year floodways except for narrow categories and conditions. Section 158-83(1) requires the applicable signed-and-sealed floodway-encroachment

analysis; section 158-222 governs compensatory excavation and hydraulic balance outside floodways; and sections 158-331 and 158-332 apply flood-protection requirements to other development, including fences and walls. Lisa Foster, CFM, as the Pinellas County Floodplain Administrator, must determine and document the exact applicability of these provisions.

The County's handling of my proposed residential swimming pool supplies a direct proportionality test. The record identifies Dayne M. Morris, Engineer II, and Gene E. Crosson, Division Manager, both of Pinellas County Building and Development Review Services; Lisa Foster, CFM, Pinellas County Floodplain Administrator; and John C. Landon, P.E., my civil engineer. A contemporaneous contractor transmittal attributed to Morris the warning that changing or disproving the mapped condition could require modeling and re-modeling the entirety of Brooker Creek; Morris later wrote directly that changing the floodway map would require modeling submitted to Pinellas County and FEMA. Crosson wrote that County Engineering had coordinated with Foster and that the submitted materials did not adequately establish that the project was outside the floodway or would cause no rise. Landon's signed-and-sealed letter explained the exhaustive hydraulic-analysis and peer-review burden. Even after I submitted that signed-and-sealed engineering evidence, the limited residential improvement was not approved. A professionally represented commercial mitigation-bank proposal involving an approximately 172-acre site cannot be held to a lower evidentiary standard.

III. Minimum scope of the required hydraulic record

Before SWFWMD or Pinellas County takes any step toward approval, the applicant should be required to submit a signed-and-sealed, reproducible, independently reviewable hydraulic record that includes all of the following:

1. A georeferenced overlay showing the effective FEMA regulatory floodway, County 25-year and 100-year floodways and floodplains, base-flood information, cross sections, current topography, surveyed channels and ditches, drainage easements, every proposed planting and management polygon, equipment and maintenance routes, staging areas, fences, structures, soil-handling areas, and every proposed credit polygon.
2. Existing-conditions and proposed-conditions hydrologic and hydraulic models using the accepted current watershed model, native model files, input and output files, survey control, vertical datums, terrain sources, boundary conditions, tailwater assumptions, roughness coefficients, blockage assumptions, calibration data, sensitivity tests, and a transparent change log.
3. A watershed-scale domain covering the entire hydraulically connected portion of Brooker Creek necessary to evaluate upstream, downstream, and lateral effects. Because County correspondence concerning this same creek described modeling and re-modeling the entire system, any narrower domain must be justified in a signed technical memorandum by the applicant and expressly accepted in writing by both SWFWMD and Lisa Foster, CFM, Pinellas County Floodplain Administrator.
4. Calibration and validation using the October 8, 2026 event, including preserved 15-minute stage and discharge data, rainfall records, high-water marks, photographs, road impacts, overbank limits, structure conditions, debris or blockage observations, and any later crest data. The model must reconcile gage height, water-surface elevation, survey datums, and FEMA datum conventions rather than comparing unlike elevations.
5. Analysis of applicable 5-year, 10-year, 25-year, and 100-year events; 24-hour and longer or otherwise controlling durations; saturated antecedent conditions; realistic temporal rainfall distributions; current and reasonably foreseeable tailwater; and sensitivity to rainfall depths greater than ordinary design assumptions where credible historical evidence warrants it.
6. Separate construction, establishment, mature-vegetation, maintenance, failure, abandonment, and corrective-work scenarios. Those scenarios must address clearing, mowing, roller chopping, planting holes, displaced soil and belowground biomass, soil amendments, compaction from equipment, ditch work,

temporary stockpiles, erosion and sediment, changed vegetation roughness, deadfall, fence and debris blockage, invasive growth, fire, storm damage, maintenance access, and any loss of storage or conveyance.

7. Complete cut-and-fill and storage accounting in cubic feet and cubic yards, including small cumulative planting excavations and any soil returned, spread, mounded, imported, stockpiled, treated, or removed. The record must demonstrate that no unapproved redistribution raises grades, obstructs the floodway, reduces flood storage, diverts flow, or changes wetland hydroperiods.
8. Capacity calculations for every ditch, pipe, culvert, channel, bridge opening, drainage easement, receiving conveyance, and known hydraulic control that can influence Tarpon Woods. The analysis must identify maintenance responsibility, legal access, present condition, and consequences of partial blockage or delayed maintenance.
9. The floodway no-rise analysis required by applicable County and federal standards for every proposed encroachment, together with any required compensatory-storage analysis outside the floodway and all FEMA conditional or final map-revision procedures if the applicant proposes to change federally regulated flood data.
10. Independent peer review by a qualified Florida-licensed professional engineer selected or approved by the reviewing agencies and paid for by the applicant, with all comments, responses, revisions, and final acceptance placed in the public record.

IV. Immediate demands to SWFWMD and Pinellas County

1. **Preserve the event record.** Immediately preserve all October 7-10, 2026 gauge, rainfall, radar-derived precipitation, high-water, stormwater-structure, maintenance, complaint, road-closure, dispatch, emergency-management, photograph, video, drone, field-note, alert-generation, and internal communication records concerning Brooker Creek and Tarpon Woods. Preserve the provisional USGS feed now and the finalized data when available.
2. **Inspect and document conditions.** Dispatch qualified staff while evidence remains visible to photograph and map overbank limits, high-water marks, flooded or threatened road segments, culverts, ditches, drainage structures, debris, obstructions, erosion, and relevant conditions adjacent to the proposed bank and surrounding homes. Record horizontal coordinates, time, datum, and measurement method.
3. **Open a formal technical issue in Application 930235.** Place this letter, the Alert Pinellas notice, preserved gauge data, field observations, and agency findings in the application record. Confirm whether Lee Hughes, P.W.S., remains the responsible SWFWMD project reviewer; identify by name and title every separately assigned SWFWMD engineering reviewer; and confirm that Lisa Foster, CFM, is the responsible Pinellas County Floodplain Administrator.
4. **Require the full hydraulic record.** Do not accept a narrative response, generalized 'no earthwork' characterization, or parcel-only water-budget discussion as a substitute for the signed-and-sealed analyses listed in Section III.
5. **Do not authorize floodway or connected-floodplain disturbance.** Until the required analyses are completed, independently reviewed, and accepted, do not issue, prepare, recommend, or rely upon any authorization that would permit excavation, grading, filling, ditch alteration, planting-hole excavation, soil redistribution, equipment staging or travel, fence installation, stockpiling, clearing, mowing, roller chopping, maintenance work, or credit-generating activity within the effective regulatory floodway or any hydraulically connected floodplain area whose storage or conveyance may be affected.
6. **Require written local floodplain findings.** Lisa Foster, CFM, Pinellas County Floodplain Administrator, should issue a project-specific written determination identifying the controlling maps, model, datum, floodway and floodplain boundaries, applicable County provisions, necessary no-rise or compensatory-

storage analyses, required local permits, and whether any proposed activity qualifies for a narrow exception under section 158-221.

- 7. Apply the same standard consistently.** Explain in writing how the evidentiary burden imposed on this commercial proposal involving an approximately 172-acre site is at least as protective as the burden the County imposed on my limited residential pool proposal affecting the same creek and floodway.
- 8. Require applicant-funded peer review and public access.** All native model files, supporting data, peer-review comments, applicant responses, revisions, and acceptance memoranda should be publicly available in usable form before staff recommendation or agency action.
- 9. Address emergency and long-term failure scenarios.** Any future permit must include enforceable rainfall, stage, inspection, stop-work, evacuation, maintenance, blockage-removal, repair, reporting, adaptive-management, and financial-assurance requirements. The applicant must identify who acts, who pays, and how performance is guaranteed if the applicant, owner, operator, or successor fails.
- 10. Provide a written response on an urgent schedule.** By 5:00 p.m. on October 9, 2026, please confirm receipt, docketing, record-preservation instructions, whether Lee Hughes, P.W.S., and Lisa Foster, CFM, are the responsible lead reviewers, and the name and title of every additional responsible reviewer. By 5:00 p.m. on October 16, 2026, please provide a substantive response stating what data were preserved, what field work occurred, what additional information will be required from the applicant, and whether any agency disagrees with a demand in this letter. These are requested response dates based on the active event, not assertions of separately created statutory deadlines.

V. Formal notice, accountability, and reservation of rights

Every recipient is now on actual notice of a measurable, documented Brooker Creek overbank event; a 36-hour rise of 2.61 feet; a 2:00 p.m. gage height only 0.12 foot, approximately 1.44 inches, below the County's reported roadway-flooding level; additional forecast heavy rainfall; the applicant's proposed work in a flood-sensitive landscape; the County's prior demand for hydrologic and hydraulic analysis; and the unresolved need to evaluate the connected watershed. No recipient should later claim that these conditions, warnings, and requested safeguards were unknown or unforeseeable.

The present flooding does not by itself establish that any future project-related action will cause a particular loss. That is exactly why pre-construction modeling, field calibration, peer review, enforceable limits, and baseline documentation are indispensable. If approval is granted without the legally and technically required review, the administrative record should be expected to face public-records scrutiny, inspector-general review, ethics review where warranted, administrative challenge, requests for injunctive relief, and judicial review. Any official who recommends or approves action should be prepared to identify the evidence relied upon and explain, under signature, how the decision protects surrounding residents and satisfies the governing standards.

Affected residents reserve all rights and remedies available under applicable law. If future authorized activities materially contribute to increased flood levels, reduced storage or conveyance, loss of access, property damage, displacement, lost income, business interruption, emergency-response costs, or other injury, potential claims will be evaluated under the governing requirements for duty, breach, causation, damages, notice, immunity, and available relief. This letter does not predetermine those legal questions; it establishes that the agencies were expressly warned of the present conditions and the specific analyses requested before construction or credit activity.

Residents are not asking for special treatment. We are demanding equal treatment, competent review, a complete technical record, and decisions grounded in measured conditions rather than optimism. If SWFWMD or Pinellas County believes any requested safeguard is unnecessary, identify the responsible decision-maker and provide the signed technical and legal basis. Silence, informal routing, or reliance on an applicant's unsupported conclusion will not resolve the issue.

Please place this notice in the official records for Application 930235 and the related County review. Circulate it immediately to Lee W. Hughes, P.W.S.; Todd Boyle; Cliff Ondercin; David Kramer, P.E.; Michelle K. Hopkins, P.E.; Lisa Foster, CFM; Kevin McAndrew; Kelli Hammer Levy; Jeremy Waugh; Cathie Perkins; Barry A. Burton; Jewel White; and every additional assigned engineering, environmental, floodplain, legal, emergency-management, public-works, and executive reviewer. Confirm that no material action will occur without a public, written disposition of these issues.

Sincerely,

William R. Nobles, Jr.
172 Annwood Road
Palm Harbor, Florida 34685
admin@SaveTarponWoods.com

Copies

- Brian J. Armstrong, P.G., Executive Director, Southwest Florida Water Management District
- Brian R. Werthmiller, CPA, CFE, CIG, Inspector General, Southwest Florida Water Management District
- Chris Tumminia, General Counsel, Southwest Florida Water Management District
- Michelle K. Hopkins, P.E., Director, Southwest Florida Water Management District Regulation Division
- David Kramer, P.E., Chief, Southwest Florida Water Management District Environmental Resource Permit Bureau
- Cliff J. Ondercin, P.W.S., Environmental Manager identified in District records and Application 930235 correspondence, Southwest Florida Water Management District
- Lee W. Hughes, P.W.S., Application 930235 environmental reviewer, Southwest Florida Water Management District
- Todd Boyle, Application 930235 engineering reviewer/contact, Southwest Florida Water Management District
- Southwest Florida Water Management District Governing Board: Jack Bispham, Chair; Ashley Bell Barnett, Vice Chair; John Hall, Secretary; Dustin Rowland, Treasurer; John Mitten, Former Chair; Kelly S. Rice, Former Chair; Michelle Williamson, Former Chair; Brian J. Aungst Jr.; Robert "Rob" Boos; Joshua Gamblin; Robert Stern; James "Jim" Turner; and Nancy Watkins
- Barry A. Burton, Pinellas County Administrator
- Jewel White, Pinellas County Attorney, and David Barrera, Assistant County Attorney identified in the CCM-25-00086 pool-appeal record
- Lisa Foster, CFM, Pinellas County Floodplain Administrator
- Kelli Hammer Levy, Director, Pinellas County Public Works, including the Stormwater and Vegetation Division
- Kevin McAndrew, Director, Pinellas County Building and Development Review Services
- Jeremy Waugh, Director, Pinellas County Utilities
- Cathie Perkins, Director, Pinellas County Emergency Management
- Pinellas County Board of County Commissioners: Dave Eggers, Chairman; Chris Latvala, Vice Chairman; Chris Scherer; Brian Scott; Vince Nowicki; Kathleen Peters; and René Flowers
- Senator Ed Hooper, Florida Senate District 21
- Other members of the Pinellas County Legislative Delegation: Senator Nick DiCeglie, District 18, Chair; Representative Kimberly Berfield, District 58, Vice Chair; Senator Darryl Ervin Rouson, District 16; Representative Adam Anderson, District 57; Representative Berny Jacques, District 59; Representative

Lindsay Cross, District 60; Representative Linda Chaney, District 61; and Representative Michele K. Rayner, District 62

- The Honorable Ron DeSantis, Governor of Florida, and Melinda M. Miguel, Chief Inspector General, Executive Office of the Governor
- James Uthmeier, Attorney General of Florida
- Alexis A. Lambert, Secretary, Florida Department of Environmental Protection, and Candie M. Fuller, Inspector General, Florida Department of Environmental Protection
- Robert Samaan, Regional Administrator, and Robert P. Ashe, Deputy Regional Administrator, Federal Emergency Management Agency Region 4
- Elizabeth Ashe, Ph.D., FEMA Assistant Administrator for Federal Insurance and senior executive of the National Flood Insurance Program
- Jillian Kraynak, State Floodplain Manager, Florida Division of Emergency Management
- United States Senators Ashley Moody and Rick Scott
- News desks: WFLA News Channel 8; WTSP 10 Tampa Bay; WTVT FOX 13; WFTS ABC Action News; Spectrum Bay News 9; and the Tampa Bay Times

Principal authorities and record sources

1. Alert Pinellas message received by William R. Nobles, Jr. at approximately 8:30 a.m. EDT on October 8, 2026; original message preserved by recipient. Pinellas County describes Alert Pinellas as its emergency-notification service: <https://pinellas.gov/alert-pinellas/>.
2. U.S. Geological Survey, Monitoring Location 02307359, Brooker Creek near Tarpon Springs, Florida, real-time gage-height, discharge, and NAVD 1988 water-level data, including the 48-hour 15-minute series accessed October 8, 2026: <https://waterdata.usgs.gov/monitoring-location/USGS-02307359> and <https://waterservices.usgs.gov/nwis/iv/?format=rdb&sites=02307359¶meterCd=00060%2C00065%2C63160&siteStatus=all&period=P2D>.
3. NOAA National Water Prediction Service, Gauge TSGF1 metadata and observations, accessed October 8, 2026: <https://api.water.noaa.gov/nwps/v1/gauges/TSGF1>.
4. National Weather Service Tampa Bay, active alerts and point forecast for the Tarpon Woods area, and Area Forecast Discussion, updated October 8, 2026: <https://api.weather.gov/alerts/active?point=28.10,-82.71>; <https://api.weather.gov/gridpoints/TBW/61,103/forecast>; and <https://api.weather.gov/products/54382619-3ae1-4f70-93a9-5a74ebd5f7f4>.
5. National Hurricane Center, Hurricane Isaias Advisory 8, October 8, 2026: <https://www.nhc.noaa.gov/archive/2026/al09/al092026.public.008.shtml>.
6. 44 C.F.R. section 60.3(d)(3)-(4), federal floodplain-management criteria for adopted regulatory floodways.
7. Pinellas County Land Development Code sections 158-83(1), 158-221, 158-222, 158-331, and 158-332, as applicable and as determined by Lisa Foster, CFM, Pinellas County Floodplain Administrator.
8. SWFWMD Environmental Resource Permit Applicant's Handbook Volume II, effective October 31, 2025, sections 3.0, 3.1(f), 3.3, 3.4, 3.7, and 3.8.
9. Pinellas County agency comments dated December 19, 2025, filed as SW-930235-039, and Lee Hughes's December 22, 2025 transmittal directing the applicant to respond.
10. Brooker Creek Watershed Alternative Best Management Practice Analysis, final report, May 2010, commissioned by Pinellas County and SWFWMD.
11. Pinellas County record DRM-24-00066 and associated June 27, 2024 pre-application review comments.
12. William R. Nobles, Jr. pool-permit and floodplain-review record, including correspondence identifying Dayne M. Morris, Engineer II; Gene E. Crosson, Division Manager; and Lisa Foster, CFM, Floodplain Administrator; the signed-and-sealed submission of John C. Landon, P.E.; and Case CCM-25-00086.
13. William R. Nobles, Jr. prior objections and supplemental submissions concerning Applications 889588, 907654, and 930235, including the August 27, September 2, September 16, and September 23, 2026 records.
14. Current Pinellas County official directories and rosters, accessed October 8, 2026: <https://pinellas.gov/county-administrator/>; <https://pinellas.gov/appointing-authorities/>; <https://pinellas.gov/photo-library-county-officials-and-constitutional-officers/>; <https://pinellas.gov/pinellas-county-board-of-county-commissioners/>; and <https://pinellas.gov/legislative-delegation>.

15. Pinellas County official records identifying Cathie Perkins, Lisa Foster, CFM, Gene Crosson, and David Barrera, accessed October 8, 2026: <https://pinellas.gov/news/pinellas-county-conducts-hurricane-emergency-exercise/>; <https://pinellas.gov/wp-content/uploads/2025/11/11.-November-10-SM-Hearing-Agenda.pdf>; and <https://pinellas.gov/wp-content/uploads/2025/05/5.-May-12-SM-Hearing-Agenda.pdf>.
16. Current Southwest Florida Water Management District Governing Board roster, accessed October 8, 2026: <https://www.swfwmd.state.fl.us/about/about-the-district/governing-board>.
17. Southwest Florida Water Management District leadership directories and organization statement identifying Michelle K. Hopkins, P.E., and David Kramer, P.E., accessed October 8, 2026: <https://www.swfwmd.state.fl.us/about/about-the-district/staff/michelle-hopkins-regulation-division-director>; <https://www.swfwmd.state.fl.us/about/about-the-district/staff/dave-kramer-environmental-resource-permit-bureau-chief>; and <https://www.swfwmd.state.fl.us/about/agency-statement-organization-and-operation>.
18. Executive Office of the Governor, Office of the Chief Inspector General, 2025-2026 Annual Report; Florida DEP Office of the Secretary and Inspector General directories, accessed October 8, 2026: <https://www.flgov.com/eog/leadership/inspector-general>; <https://floridadep.gov/sec>; and <https://floridadep.gov/oig>.
19. Office of the Florida Attorney General, official biography of Attorney General James Uthmeier, accessed October 8, 2026: <https://www.myfloridalegal.com/ag-bio>.
20. Federal and state flood-program leadership records, accessed October 8, 2026: <https://www.fema.gov/about/organization/region-4>; https://www.fema.gov/sites/default/files/documents/fema_rsl_national-flood-insurance-manual_06032025.pdf; <https://www.floridadisaster.org/dem/mitigation/floodplain/>; and <https://portal.floridadisaster.org/mitigation/MitigateFL/External/Mitigate%20FL%20Meeting%20Documentation/2025%20Meetings/Quater%204%20-%20December%202025/Mitigate%20FL%20Minutes%2012-9-2025.pdf>.