

- FDOT’s own consultant warned in March 2025 that the borrow-pit site is underlain by limestone bedrock “susceptible to dissolution and the subsequent development of karst features such as voids and sinkholes,” concluding that “the Owner must understand and accept this risk.”

Despite that warning, FDOT is proceeding with the purchase and taxpayer-funded site preparation for a new borrow pit located inside a **Priority Focus Area** and **Outstanding Florida Water** basin.

This is not a clerical error but a pattern of advancement without valid federal permits or consultation under **33 U.S.C. §1344(q)**.

III. Independent Evidence of Environmental Change and Omission

1) FDOT’s Own 2025 Borings Contradict the SEIR

Between February and March 2025, FDOT’s consultant TestLab, Inc. performed 36 geotechnical borings across the Southworth parcel and Segment 3A right-of-way. Those borings recorded groundwater at **2.3–4 ft NAVD** and limestone at or near surface —evidence of hydraulic connectivity and spring seepage consistent with the Floridan aquifer.

Despite this, the August 2024 SEIR claimed: “**No changes in impacts to Floodplains or Water Resources.**” This omission renders the SEIR scientifically obsolete and legally inaccurate.

2) Clark Hull Environmental Technical Evaluation (10/22/24)