

The Clark Hull Environmental Technical Evaluation (Form 62-345.900(2), F.A.C.) identified **cold-water seep features** and **aquifer discharge** consistent with spring activity on site, contradicting FDOT's assertion that the project area is not within an OFS or spring-influenced zone.

3) Spring Verification Letter (9/21/25)

An independent field observation on **September 21, 2025** documented clear, cold-water flow and aquatic vegetation typical of a spring-fed system, corroborating both the Clark Hull analysis and the boring data showing direct aquifer interaction.

Together these records show that FDOT's **1998 environmental baseline** no longer represents the site's actual conditions.

IV. Pattern of Segmentation and Wetland Misclassification

1) Artificial Division of Segments 3A and 3B

FDOT segmented the review into 3A and 3B, avoiding comprehensive evaluation of connected wetlands and aquifer systems. This segmentation conflicts with **Clean Water Act §404(b)(1) Guidelines** (cumulative effects) and the duty to evaluate connected actions.