

evaluations, inspection records, and inter-agency communications used to justify the NPR and SEIR approvals.

5. **Acknowledgment of Record:** Pursuant to **§§119.07 and 373.026, F.S.**, provide written confirmation of receipt and recording of this public comment within **30 days**.

Public-Interest Statement

Florida's transportation agencies cannot claim a "higher standard" while advancing projects through false permit entries and ignored aquifer breaches. Treating an NPR as authorization undermines the Clean Water Act and Florida's springs-protection mandates, placing the Crystal River–Kings Bay Outstanding Florida Spring system at risk.

VII. Federal Statutory Conflicts and Violations

FDOT's wetland misclassification, segmentation, and reliance on a non-existent permit conflict with multiple federal requirements.

1. **Clean Water Act §§404 and 401**

Under **33 U.S.C. §§1344 and 1341**, any discharge of dredged or fill material into waters of the United States requires a valid **§404 permit** and **§401 certification**.

Substituting an **NPR** for a permit eliminated:

- Coordination with **EPA Region 4** and **USACE**;
- The **LEDPA** analysis (**40 C.F.R. §230.10**); and
- Public notice/comment (**33 C.F.R. §325.2(a)(2)**).