

DRAFT



Memorandum

TO: Frank Nearhoof

THROUGH: Greg Knecht & Shelley Yaun

FROM: Tracy C. Robb, P.E.
FDEP, SFWMD Acceler8 Office

DATE: May 16, 2006

SUBJECT: PSTA Project Status

The following items are outstanding for the PSTA Project based on review of information provided to FDEP and responses to Gary Goforth's comments by the Corps. An update on the status of the project is requested.

1. According to the Corps' response to comments, design of the FAV cell is still underway; therefore, the following concerns remain unresolved:
 - a) Improvements such as levees, structures and possibly temporary pumps will be necessary for the FAV cell to function as proposed; however, it is unclear where and how all of these facilities will be constructed and operated.
 - b) Verification that operation of the S-319 pump station and the East Distribution Cell (EDC) will not be impacted during construction, start-up or operation of the PSTA project since the remaining cells in STA-1E are dependent on the proper function of these facilities.
 - c) Direct water withdrawal from or connection to the C-51 Canal for use by the PSTA project may require a consumptive use permit. This additional water demand was not considered in the design of STA-1E as permitted.
 - d) It is not clear how the FAV cell will contain the proposed exotic vegetation. The Corps has indicated that the spread of FAV will be limited by the design of the discharge structures since they are submerged structures and, if necessary, application of herbicides in downstream cells. Vegetation barriers are also under consideration.

Action: Request submittal of the proposed design of the FAV Cell from the Corps as soon as possible along with a response to the above concerns.

2. Since the initial and ultimate operation and maintenance entity for STA-1E will be SFWMD, the following items should be discussed with the District prior to permitting of the PSTA Project:
- a) During the PSTA's 2-year demonstration period, the operation of Cells 1 and 2 will be modified by the Corps as needed to achieve the desired growth and test results, which may result in a decrease in performance of STA-1E as permitted by FDEP.
 - b) Per the Corps, operation and vegetation management of the east portion of the EDC, Cell 1 and Cell 2 will be the responsibility of the Corps and it's contractor; however, the District will operate the facility based on the Corps direction. The District will also provide assistance to the Corps at their request which may include activities described in the PSTA monitoring plan.
 - c) The entity responsibility for inspecting and reporting on the levee conditions in and around the PSTA project during the project period needs to be identified along with an outline of requirements for turning over the facilities, if different from the Project Cooperation Agreement. The Corps has suggested that they inspect only the internal levees, presumably within Cell 2 and at the FAV cell (if included in design). The District would inspect and maintain all other levees, including the levees around the PSTA. Note that the stage and duration within the Cell 2 demonstration area is different from the STA-1E Operation Plan. For example, a maximum elevation of 19.25 is proposed for Cells 1 and 2 with a levee elevation of 21.5 between the two cells.
 - d) After the PSTA project period, it is unclear who will be responsible for removing the "temporary facilities" (i.e interior levees) and completing any additional work necessary to restore the EDC, Cell 1 and Cell 2 to the permitted design.
 - e) The culvert pipe material under the access ramp is corrugated metal. Since the ramp in this area is permanent, the District will ultimately be responsible for the pipe. Generally, the District requires all new culverts to be RCP.

Action: Request direction from SFWMD on each of these items in order for appropriate permit conditions to be prepared.

Cc: Annet Forkink
Gary Goforth