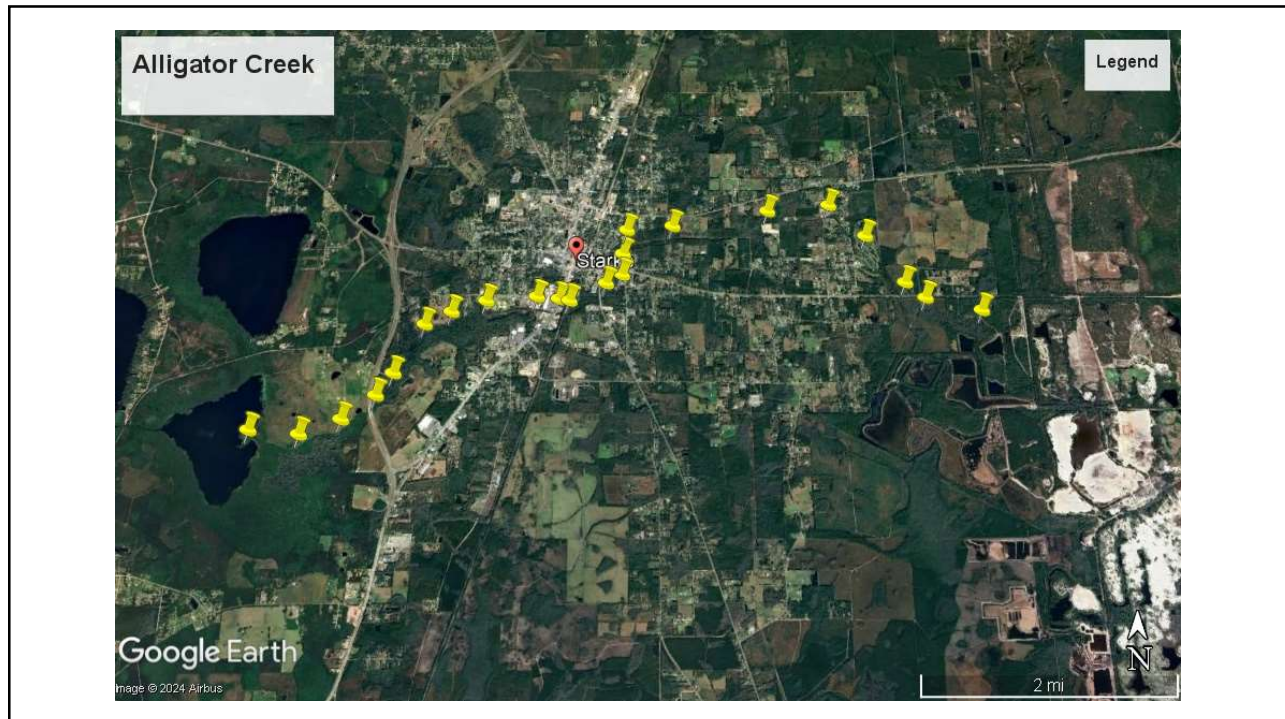


Suwannee River Water Management District Edwards Bottomlands Project

Paul Still
Bradford Soil and Water Conservation District
11/19/2024

1



2

Edwards Bottomlands Site with property lines 2022



3



2017



2024

4

Three Major Concerns about the Current Conditions

1. Long term cost to the City of Starke associated with permit conditions;
2. Flooding along Alligator Creek upstream of the project;
3. Elevated Radium levels from Chemours discharges.

5

1. Long term cost to the City of Starke

Environmental Resource Permit issued to the City of Starke

SUBJECT: Permit Number ERP-007-228878-1 Edwards Bottomlands Mitigation Area
Dear Ricky Thompson:

Enclosed is your individual permit issued by the Suwannee River Water Management District on February 14, 2017.

6

Permit Condition

11. The permittee shall hold and save the District harmless from any and all damages, claims, or liabilities that may arise by reason of the construction, alteration, operation, maintenance, removal, abandonment or use of any project authorized by the permit.

BSWCD Concern

If the SRWMD was responsible for construction and up to this point for operation and maintenance, why are they held harmless?

Is the City of Starke responsible for potential upstream flooding damages?

7

16. The permittee shall provide routine maintenance of all components of the stormwater management system to remove trapped sediments and debris. Removed materials shall be disposed of in a landfill or other uplands in a manner that does not require a permit under Chapter 62-330, F.A.C., or cause violations of state water quality standards.

BSWCD concerns are illustrated in the following slides showing trapped sediments and debris.

8

Sediment deposition



9



10

Channel bank erosion



11

Trash and debris



12



13

Permit Condition

21. Successful establishment of the wetland mitigation will have occurred when:
- At least 80 percent of the planted individuals in each stratum have survived throughout the monitoring period and are showing signs of normal growth, based upon standard growth parameters such as height and base diameter, or canopy circumference; and,

BSWCD Concern

This condition is not being met. Many planted trees have died and the majority of the the surviving tress and not showing normal growth.

14

21. Successful establishment of the wetland mitigation will have occurred when:

- e) less than 5% areal coverage of plants on the Florida Exotic Pest Plant Council's list of Florida's most invasive species within the mitigation area are not present.

BSWCD Concern

Site visits this month have found significant stands of invasive plants. Some of the invasive plant species are setting seeds which can increase coverage next year.

15

Permit Condition

22. Monitoring reports for the Edwards Bottomlands Mitigation Area (EBLMA) shall be conducted which reflect the objectives of the EBLMA as noted in and in accordance with the final 12 Point Mitigation Plan approved by the USACE.

BSWCD Concern

Monitoring is being done by SRWMD with contractors. The monitoring reports do not appear accurately reflect conditions on the site with respect to invasive plant coverage and planted tree growth. The BSWCD requested Edwards Bottomlands documents for 2024 from the SRWMD and was asked to pay over \$100. The City of Starke want to ask for and review the documents if they do not have them.

16

Permit Condition

23. The permittee shall monitor and maintain the wetland mitigation area(s) until the criteria set forth in the Wetland Mitigation Success Criteria Conditions(s) are met. The permittee shall perform corrective actions identified by the District if the District identifies a wetland mitigation deficiency.

BSWCD Concern

The SRWMD is monitoring and maintaining the wetland mitigation areas but do not appear to be taking the corrective actions that current conditions appear to require. Actions that appear to be required would include invasive plants control, sediment and debris removal, and removal of plants slowing water flows.

17



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, JACKSONVILLE DISTRICT
P. O. BOX 4870
JACKSONVILLE, FLORIDA 32232-0019

July 11, 2019

REPLY TO
ATTENTION OF

Regulatory Division
North Permits Branch
Panama City Permits Section
SAJ-2016-03157 (NW-RLT)

Florida Department of Transportation, District 2
Attn: Mr. Van Humphreys
1109 South Marion Avenue
Lake City, Florida 32025

City of Starke
Attn: Mr. Bob Milner
P.O. Drawer C
Starke, Florida

Suwannee River Water Management District (Agent)
Attn: Mr. Patrick Webster
9225 CR 49
Live Oak, Florida 32060

Gentlemen:

Your application for a Department of the Army permit received on March 21, 2019, has been assigned number SAJ-2016-03157. A review of the information and drawings

BSWCD Question

What are the City of Starke's responsibilities related to the ACOE permit?

18

ACOE Permit

9. Performance Standards: To meet the objectives of the approved compensatory mitigation plan, the Permittee shall achieve the following performance standards:

- b. Cover of Category I and II invasive exotic plant species, pursuant to the most current list established by the Florida Exotic Pest Plant Council at <http://www.fleppc.org>, -6- and the nuisance species, dogfennel (*Eupatorium capillifolium*), Bermudagrass (*Cynodon* spp.), Bahiagrass (*Paspalum notatum*), and cattail (*Typha* spp.). shall total less than 5 percent.
- c. Less than 20 percent mortality of planted wetland species.

BSWCD concern

ACOE standard requires control of dogfennel and cattail that are currently growing on the site. This standard does not appear to be being met.

19

9. Performance Standards: To meet the objectives of the approved compensatory mitigation plan, the Permittee shall achieve the following performance standards:

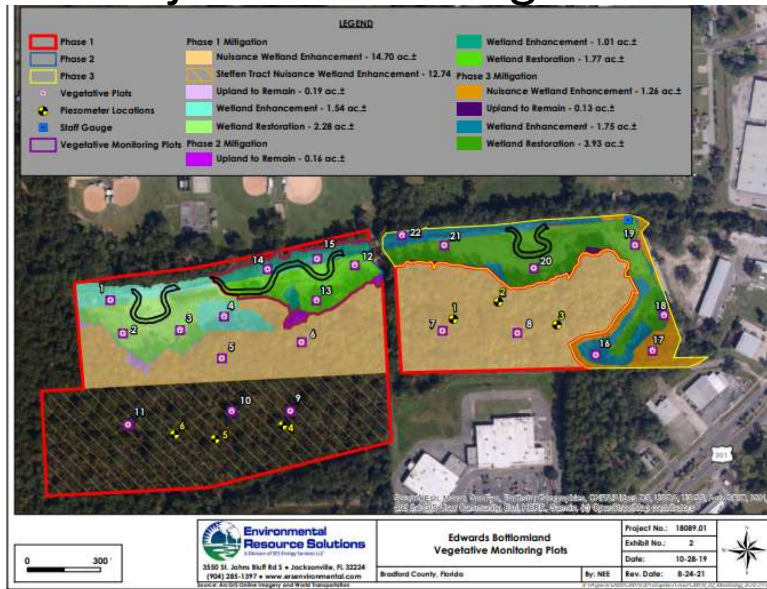
The Permittee shall achieve the above performance standards by the end of the 5-year monitoring period, with no maintenance during the 5th year of monitoring. In the event that the above performance standards have not been achieved, the Permittee shall undertake a remediation program approved by the Corps in accordance with the Remediation Special Condition of this permit.

BSWCD Concerns

ACOE permit issued July 11, 2019. The project site was divided into 3 phases for monitoring. Time Zero Monitoring Reports were dated Phase 1, November 2019, Phase 2 June 2020 and Phase 3 August 2021. The current status of the 3 phases is unknown because the BSWCD was not able to obtain the Monitoring Reports for 2024. The City of Starke may have copies of the Monitoring Reports. Will Phase 1 require a remediation program?

20

Project Monitoring Phases



21

2. Flooding along Alligator Creek

Nine of the 10 Alligator Creek Historic Crests have been after the Edwards Bottomlands construction was completed

1. 147.98 ft on 09-11-2017
2. 146.99 ft on 08-05-2024
3. 146.86 ft on 07-07-2021
4. 146.64 ft on 09-21-2021
5. 146.33 ft on 12-17-2023
6. 145.75 ft on 08-02-2023
7. 145.70 ft on 03-24-2022
8. 145.49 ft on 09-10-2022
9. 145.38 ft on 07-31-2023
10. 144.82 ft on 09-10-2022

22

3. Channel blockage



23



24



25

3. Elevated Radium levels from Chemours discharges



Chemours draft permit language

“The permittee is authorized to receive approximately 3.0 MGD maximum daily flow from Chemours Trail Ridge South for auxiliary treatment and”

Chemours Trail Ridge South Radium level Report dated May 23, 2023

“May 17, 2023 (verbal) and email (May 18, 2023, the radium 226/228 was reported to be 9.3 pCi/L and gross alpha was 6.2 pCi/L (permit limits of 5.0 pCi/L and 15.0 pCi/L, respectively).”

26