

April 21, 2006

FROM: The Biscayne Bay Regional Restoration Coordination Team

TO: The South Florida Ecosystem Restoration Task Force Working Group

SUBJECT: The Biscayne Bay Coastal Wetlands (BBCW) Acceler8 Project Draft Basis of Design Report

As accepted by the Working Group on January 20, 2006, the BRRCT Action Plan calls for the BRRCT to review and provide comments on Biscayne Bay related Comprehensive Everglades Restoration Plan (CERP) projects, including the BBCW project. During the recent public presentation and comment period for the above referenced document, the Biscayne Bay Regional Restoration Coordination Team (BRRCT) received two separate briefings on the design alternatives under consideration for this project. After carefully reviewing the information provide, the BRRCT has concluded that proposed Option 1 in the BBCW draft BODR may be inconsistent with sub-goals in the Action Plan relating to reduction of pollution, improvement of water quality, enhancement of fish and wildlife habitat and protection of imperiled species to maintain biodiversity.

As currently recommended by the SFWMD's consultant, the C-1 Canal Flow Way component of the Cutler Wetlands portion of the project (Option 1) includes a pump station capable of moving water at a rate of four hundred cubic feet per second (400 CFS) to be located within the C-1 Canal at SW 87th Avenue in the vicinity of the South Dade Landfill and South Dade Wastewater Treatment Plant. As indicated by multiple agencies, the poor groundwater quality in this area is well documented. After much discussion on this item, the BRRCT recommends that this pump station be relocated upstream in the canal as outlined in the recommended design alternative, Option 2 in the BBCW draft BODR. The BRRCT considered the following information in formulating its recommendation:

The Proposed location of the pump station potentially poses an environmental risk, as the pump may draw lower quality or degraded groundwater from the areas adjacent to the landfill and/or the wastewater treatment plant, and divert it into coastal wetlands of relatively high quality, as reported by representatives of Biscayne National park and Miami-Dade County. The BRRCT acknowledged additional water quality analysis will occur before a final decision is made on the recommended design alternative. However, we want to take the opportunity to express concerns with the water quality analysis performed to date, as the decision on the recommended design alternative may be prior to the Working Group's next meeting in July.

The current design alternative (Option 1) for the location of the pump station is based upon the conclusion that the water quality in the vicinity of the landfill and wastewater treatment plant appears to meet State of Florida Class III Surface Water Standards, however, there are two concerns with this criteria: 1) The Class III Standards do not meet the anti-degradation as mandated in the Florida Statutes specific to a body of water that is classified as an Outstanding Florida Water, as Biscayne Bay is (including all surface waters within Biscayne National Park). Furthermore, in the BODR it is not clear that all OFW anti-degradation standards would be met in the receiving wetlands downstream of the proposed SW 87 Avenue pump location. This would seem to introduce an unacceptably high level of risk into this project design.

It is the understanding of the BBRCT that the potential costs for different design alternatives of this portion of the project is a limiting factor. Therefore, the BBRCT further recommends an increase in the project budget threshold to allow for Option 2 to be fully considered.

Incorporating these recommendations into the current alternatives will promote consistency with the Ecological and Physical Restoration sub-goals of the BBRCT Action Plan and eliminate the avoidable environmental risk and uncertainty associated with the BBCW Acceler8 project relating to water quality. The BBRCT thanks the Working Group for considering our concerns, and we look forward to providing additional input as the project moves forward.