



October 7, 2020

State of Florida Department of Environmental Protection
Via email Attention:
Mr Gregory W Garis
Program Administrator, Beaches Inlets and Ports Program
Division of Water Resources

Ref: FDEP Permit Modification Number 0333315-03-JN Pre construction submittal –
SKA follow-up comments

Dear Mr Garis,

SKA is writing to follow-up to SKA's June 12th objections to the June 4, 2020 City of Sarasota (City) and US Army Corps of Engineers (USACE) Pre construction submittals for FDEP Permit Number 0333315-03-JN. Specific Condition 5 lists 13 required submittals for your review. We offer this follow-up concern to assist FDEP in your review. SKA asks that you respond to this timely concern and prohibit groin construction until these concerns are resolved.

The pre construction documents are notably absent concerning the groin construction plans. The construction is not to begin until January 2021. SPECS 35 42 30 lists a number of responsibilities for the contractor to develop groin construction plans. That work remains undisclosed. Attached is the extract to the Corps bid document submitted to FDEP. SKA concerns are:

1. Traffic plan for the delivery of the hundreds of large granite blocks are needed and promised in the Environmental Protection Plan, Section III but is undisclosed.
2. The heavy delivery truck traffic will impact the roads on Lido Key and St Armands square during "season". What beach access will be used to reach the groin site (the North per the submitted SPECS or the South per the contract with the County)?
3. Groin construction equipment traffic on the beach to haul to foundation mattress and armor stones will be extensive and noisy during season but is undisclosed.
4. The contract between the City and the County indicates that the contractor would need to remove some trees from the County park to allow the delivery of the groin materials. The contract states that a "Tree Removal" Permit will be required. There is no indication that this permit has been issued or disclosed.
5. The plans to cover the groins with nourishment sand are undisclosed. The source of the sand cover is undisclosed. The plans need to be reviewed by FDEP and publicly posted as a pre-construction document.
6. On July 1, 2020, the US Army Corps of Engineers submitted an declaration from Cottrell to US Federal Court. It is enclosed with the transmittal email. It states that Cottrell intends to construct a \$1.9million jetty. A jetty is not included in the permit. Please investigate and have this clarified.

FDEP must require submittal of a groin construction plan, review it and take no exception to the plan. FEDP should also post it for public reference as a preconstruction submittal.

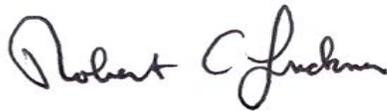
SKA is self-represented in this request and can be contacted at the above address and phone number or at clucknerska@aol.com.

Thank you in advance for your prompt response to these issues.

Respectfully submitted,



Catherine E Luckner
SKA President



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SKA Director

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SPECS 35 42 30

SD-02 Shop Drawings

Groin Construction Work Plan; G, DO

The Contractor shall submit a groin construction work plan to the Contracting Officer for approval at least 45 days prior to the initiation of groin work. The submitted work plan shall describe in detail how the Contractor will perform installation of geotextile, fabrication and placement of marine mattresses, and placement of armor stone. The submitted work plan shall include but not limited to the following:

- a. The names of all personnel working on site, their job title and job description, and the number of years of associated construction work experience on similar rock structures.
- b. How the work will be achieved in accordance with the requirements of the contract documents and herein, such as, but not limited to the following:

(1) The sequence of completing Structures, such as

- i. Mobilization;
- ii. Commencement of groin work for each groin;
- iii. Establishment of horizontal and vertical control work;
- iv. Conducting pre- and post-construction surveys;
- v. Expected completion of each groin structure;
- vi. Contractor's preparedness to cover any work with backfill;
- vii. Expected substantial completion of the entire work;
- viii. Expected completion of the entire work; and
- ix. Demobilization.

(2) The type of equipment to be used.

(3) Where and how the equipment will be set up during work hours along the stone structures and how the areas of work will be accessed as well as after hours.

c. Describe how the Contractor plans on affixing the Geotextile to assembled marine mattresses.

d. The method of loading the assembled marine mattresses from the staging areas to vehicles and barges for transportation to the placement sites and the type of equipment and personnel to be utilized. The Contractor shall include verification of the individual weight of the assembled marine mattresses from the fabricator. Make reference to the Crane Critical Lift Plan required in Section 01 35 26 GOVERNMENTAL SAFETY REQUIREMENTS where applicable.

e. Describe and include drawings of the Contractor's method of storing assembled marine mattresses.

f. Describe the methods layout and installation of the marine mattresses detailing the materials, methods, and equipment to be

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utilized in excavation and installation. Include the proposed method/s for connecting individual mattresses together before placing them, as necessary. Make reference to the Crane Critical Lift Plan required in Section 01 35 26 GOVERNMENTAL SAFETY REQUIREMENTS where applicable.

g. Describe which upland/Marine routes where the Contractor

intends to transport the assembled marine mattresses and armor stone from one location to another and to the groin construction site.

h. The methods used for stone placement, adjustment, or resetting.

i. The methods proposed for reworking portions of the stone structure found to be outside the construction tolerances.

j. The name of the company performing the as-built surveys, the names of personnel performing the surveys, and their job title and job description.

k. If using barges, submit a detail lighted marker plan of the temporary markers design and installation. The plan shall include the following incorporate the list of materials; installation methods and equipment; and Correspondence of U.S. Coast Guard approval.

l. The name of the company performing the as-built surveys, the names of personnel performing the surveys, and their job title and job description.

m. The frequency of both the as-built survey efforts and the submittal of data to the Contracting Officer.