

# Comments on the Loxahatchee River Watershed Restoration Project Draft Integrated Project Implementation Report and Environmental Impact Statement

**Submitted to:**

Dr. Ann Hodgson  
U.S. Army Corps of Engineers  
Jacksonville District  
P.O. Box 4970, Jacksonville, FL 32232-0019  
LoxRiverComments@usace.army.mil

**Submitted by:**

Palm Beach County



**Prepared by:**

Jeremy McBryan, PE, CFM  
County Water Resources Manager  
Palm Beach County  
301 North Olive Avenue, 11<sup>th</sup> Floor  
West Palm Beach, Florida 33401  
jmc Bryan@pbcbgov.org  
561-355-4600

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## Introduction

At the Palm Beach County (County) Board of County Commissioners (BCC) workshop meeting held April 30, 2019, County staff briefed the BCC on the Draft Integrated Project Implementation Report (PIR) and Environmental Impact Statement (EIS) for the Loxahatchee River Watershed Restoration Project (Loxahatchee Project or LRWRP) and requested direction regarding the development and submittal of comments on the Draft PIR/EIS. After hearing numerous public comments from stakeholders and a robust discussion, the BCC unanimously approved the following motion:

1. Continue to support state and federal efforts to restore the Loxahatchee River Watershed,
2. Communicate key concerns with the proposed project, and
3. Express interest in collaborating with the U.S. Army Corps of Engineers and South Florida Water Management District to reconsider the Mecca Reservoir to be more compatible with adjacent lands.

As was previously communicated via letter dated July 16, 2018 to Colonel Jason Kirk from County Administrator Verdenia Baker (see Attachment 1) and per the above motion approved by the BCC on April 30, 2019, the County continues to support efforts by the U.S. Army Corps of Engineers (Corps) and the South Florida Water Management District (SFWMD) to restore the Loxahatchee River Watershed. This document is intended to communicate key concerns and other technical issues identified by the County during the review of the Loxahatchee Project Draft PIR/EIS. In addition, the County is hereby communicating interest in collaborating with the Corps and SFWMD to reconsider the Mecca Reservoir to be more compatible with adjacent lands.

## General Comments

The following general comments are intended to provide overarching programmatic, policy and technical feasibility questions and concerns that are critical to the County.

### Project Scope and Everglades Restoration Objectives

The County is disappointed that two key overarching Comprehensive Everglades Restoration Plan (CERP) objectives of increasing the availability of fresh water for agricultural, municipal, industrial users and reducing agricultural and urban flood damages were not explicitly included as objectives of the Loxahatchee Plan and instead categorized as potential incidental benefits. The County also remains disappointed that the purpose and scope of the Loxahatchee Project was also decreased during public scoping to no longer provide reductions in damaging freshwater discharges to the Lake Worth Lagoon, which was envisioned in CERP.

Letters dated July 8, 2015 and September 15, 2016 to SFWMD Executive Directors Blake Guillory (see Attachment 2) and Ernie Marks (see Attachment 3) from numerous local government officials communicated the importance of incorporating the original CERP goals into ongoing Loxahatchee Project planning activities to address the comprehensive water resources needs within the County.

The County will continue to advocate that the South Florida Ecosystem Restoration Program Integrated Delivery Schedule (IDS) include CERP components that provide benefits to the Lake Worth Lagoon, reduce potential flood damages, and increase the availability of water supplies and that relevant components be implemented as soon as possible.

The County is concerned that the Loxahatchee Project does not address excess stormwater runoff from the L-8 Basin. The SFWMD's Restoration Strategies plan finalized in 2012 assumed that 90,000 acre-feet of storage (45,000 acre-feet for the Loxahatchee Project and 45,000 acre-feet to assist with Everglades water quality) was constructed and operational to assist in temporarily storing and redirecting excess L-8 Basin stormwater runoff away from both the Everglades and the Lake Worth Lagoon. As of today, only 45,000 acre-feet of storage has been constructed to assist in achieving Everglades water quality goals, not excess L-8 Basin runoff. Without the 90,000 acre-feet of storage that was assumed in the Restoration Strategies plan, achieving Everglades water quality requirements will be very challenging. In addition, without this amount of storage in the region, negative impacts to the Lake Worth Lagoon, which receives large volumes of excess stormwater runoff from the L-8 Basin, will continue.

### C-18 West (Mecca) Reservoir

The County is concerned that the proposed 20-foot embankment height of the C-18 West (or Mecca) Reservoir is not compatible with adjacent lands, introduces unnecessary flood risks to adjacent residents and is not aesthetically appealing.

There is also concern that the C-18 West (Mecca) Reservoir will be promoted as the replacement storage feature, mandated to be online by December 31, 2022 via consent orders associated with the Everglades Stormwater Treatment Areas Everglades Forever Act and National Pollutant Discharge Elimination System permits issued to SFWMD by the Florida Department of Environmental Protection. As stated above, the C-18 West (Mecca) Reservoir does not address excess stormwater runoff from the L-8 Basin and therefore does not meet the intent of the Restoration Strategies plan.

### Aquifer Storage and Recovery

The Aquifer Storage and Recovery (ASR) well performance assumption of 70 percent recovery efficiency appears optimistic and is not supported by technical information included in the Draft PIR/EIS. The poorly justified or unjustified efficiency assumptions result in many questions about the accuracy and robustness of the results. Additional modeling simulations should be implemented to determine the impact of lower (e.g. 25 to 50 percent) ASR well recovery efficiencies.

In addition, there appears to be high uncertainty regarding achievement of water quality standards related to ASR well operations and the potential risks and related costs that may be incurred to address applicable water quality standards to enable ASR well operations consistent with the tentatively selected plan (TSP).

### Modeling

There are numerous instances where detailed modeling information is either not provided in the Draft PIR/EIS or wholly inadequate. As such, caveats regarding the restrictions and/or constraints of the modeling tools, the lack of sea level rise projections included in the evaluation, and the lack of flood risk modeling result in many questions about the accuracy and robustness of the results as well as the legitimacy of the TSP selection.

Loxahatchee River flows simulated for the existing conditions appear higher than previous model runs which may result in proposed restoration project elements needing to do less to achieve river restoration flow targets.

Based on information provided by the Indian Trail Improvement District (ITID), the Loxahatchee Project modeling assumes higher canal water levels that ITID has held or will hold. As such, there are concerns that the water assumed to be available for delivery to the Loxahatchee Project features from ITID canals may be overestimated and may impact the predicted restoration benefits of the Loxahatchee watershed. Please correct these modeling inaccuracies.

Please include model documentation report(s) with detailed model assumptions, figures, limitations, water budgets, etc. similar to what is provided in other Integrated Project Implementation Reports and Environmental Impact Statements.

### Plan Formulation

Due to the large number of unnecessary alternatives (many of which did not assume already constructed G-160 and G-161 were in place), plan formulation resulted in limited ability to detect the benefits of individual project elements.

During 2018, the County was told by SFWMD leadership that high-performing components of the alternatives would be grouped together and new alternatives would be re-formulated. However, based on the plan formulation documentation in the Draft PIR/EIS, it appears this reformulation was never conducted.

The County suggests that an evaluation be conducted for a revised Alternative 5R with the C-18 West (Mecca) Reservoir replaced with a shallower flow-through marsh-type feature consistent with the plan for that property that was communicated to the County by SFWMD during land acquisition negotiations. A shallow flow-through marsh on Mecca would enable better integration with the J.W. Corbett Wildlife Management Area to the west and able to be integrated with the proposed natural areas in the northern portion of the Avenir property in the future. This approach will result in additional habitat units within Mecca and the estimated construction and operational costs would be far less than the currently-proposed deep reservoir. The County understands that with this revision to the TSP, there may be a need to replace some of the storage volume that was provided by the C-18 West (Mecca) Reservoir to ensure similar benefits to the Loxahatchee River and slough are realized, especially in the late dry season. The County looks forward to collaborating with the Corps and SFWMD on this issue.

### Lake Okeechobee Operations

Due to the recent initiation of the Lake Okeechobee System Operating Manual (LOSOM) effort by the U.S. Army Corps of Engineers, there is uncertainty regarding future Lake Okeechobee operations and its potential effects on the achievement of minimum flows and levels (MFLs) at the Loxahatchee River. In addition, Lake Okeechobee serves as backup water supply for the City of West Palm Beach's Grassy Waters Preserve which in turn assists in achieving Loxahatchee River MFLs and provides drinking water to the city's residents. Please provide a summary of how the current Lake Okeechobee System Operating Manual effort by the U.S. Army Corps of Engineers will or will not impact the Loxahatchee River Watershed Restoration Project.

In addition, a determination was made in the Draft PIR/EIS that conveying water from the L-8 Canal to the Loxahatchee Project features would be problematic due to the need and potential project costs to treat Lake Okeechobee water within the L-8 Canal or potential restrictions on Lake Okeechobee outflow operations (or get-away capacity) via the L-8 Canal to minimize Lake Okeechobee water from being conveyed to the Loxahatchee River. To align with the overall objectives of CERP to convey more Lake

Okeechobee water south to the Everglades, the need for (and related frequency of) Lake Okeechobee regulatory releases via the L-8 Canal should be re-evaluated to determine if they can be minimized or avoided entirely.

### Report Format, Organization and Quality

The Loxahatchee Project Draft PIR/EIS follows the organizational format of other PIRs, however, the quality of the document suffered from an apparent rush to completion. The large number of authors for the various sections resulted in numerous inconsistencies between sections and produced a very large amount of redundant information presented in the various sections (e.g. several sections provide an introductory paragraph on the purpose of the Loxahatchee Project which were not always consistent). These inconsistencies made the report difficult to read and follow. In addition, reading and comprehending the report was very difficult due to the multiple errors in referencing sections, table numbers, appendices, and annexes.

Duplicating much of the report information in appendices and annexes, possibly done to make each report component a stand-alone document, resulted in a much lengthier document than actually needed to impart the information. Moreover, the practice of “cutting and pasting” information from one section to another appears to have been used which resulted in errors being replicated throughout the document.

### Detailed Comments

The following detailed comments include suggested edits and questions that are intended to assist in improving the overall quality of the Draft PIR/EIS and address some of the typographical and other errors encountered.

#### Main Report

##### *Executive Summary Page x*

Figure ES-1 should show the Pine Glades Natural Area in yellow. This natural area contributes water to both Pal-Mar on the north side of Indiantown Road and to the C-18 Canal with water drained to the Northern canal system to the south, which sends water eastward in the C-18 Canal.

##### *Executive Summary Page xiii*

Figure ES-3: Number 4 has misspelling of “backfill”. Figure ES-3 also shows the C-18 Canal west leg weir as a proposed control structure, but that structure already exists on the east side of the Bee Line Highway (see Appendix A, Section 2.4.2.6).

##### *Executive Summary Page xv*

First line is missing the word “to” between “ways” and “reduce”.

##### *Executive Summary Page xvii*

In the paragraph on maintaining existing levels of flood protection, the last sentence appears to state that additional modeling is needed to show that the TSP will not cause flooding to surrounding landowners. This information should have been available prior to selecting Alternative 5R as the TSP. When will this additional modeling occur? Before the Final PIR/EIS or during the design and development of operating plans? Other sections of the report may clarify this, but suggest it should be included in the Executive Summary.

*Page 1-5*

In the July 2018 update of the South Florida Ecosystem Restoration Program Integrated Delivery Schedule (IDS), available at <https://www.evergladesrestoration.gov/>, Yellowbook components X, Y and K are listed as being addressed by the Loxahatchee Project. Yet only components K, GGG and OPE were considered in the Draft PIR/EIS. Please provide more details on how this decision was made.

The County remains disappointed that the purpose and scope of the Loxahatchee Project was decreased during scoping to no longer provide benefits to the Lake Worth Lagoon. The County will continue to advocate that the South Florida Ecosystem Restoration Program Integrated Delivery Schedule (IDS) include CERP components that provide benefits to the Lake Worth Lagoon, reduce potential flood damages, and increase the availability of water supplies and that relevant components be implemented as soon as possible.

*Pages 1-6 and 1-7*

Table 1-2 should include a description of the Pine Glades Natural Area, either as a separate 6,600-acre natural area or at least as a southern extension of the Pal-Mar description. Water from that site feeds Pal-Mar to the north through culverts under Indiantown Road, through the South Indian River Water Control District (SIRWCD) canal system in Jupiter Farms and from the Northern Palm Beach County Improvement District (NPBCID) canal systems into the C-18 Canal. The County suggests that the approximately 3,000-acre Hungryland Slough Natural Area be included in the description, again as a separate natural area, as it is a major connector of natural land between J.W. Corbett Wildlife Management Area (WMA) and the Loxahatchee Slough and lies immediately north of the west leg of the C-18 Canal. Water from the Hungryland Slough Natural Area drains into the west leg of the C-18 Canal and helps provide water to the Loxahatchee River. Figures ES-1 and 1-3 both show the Hungryland in yellow, but it is not in the descriptions. In addition, the description of the Loxahatchee Slough should show 13,000 acres as part of that natural area instead of the 11,000 acres shown. Moreover, the last sentence in the Loxahatchee Slough description implies that there is an invasion of melaleuca in the Loxahatchee Slough. That does not reflect the current status in the Loxahatchee Slough. County efforts have significantly reduced melaleuca within the Loxahatchee Slough Natural Area. Invasive non-native vegetation has been reduced to less the 1 percent of aerial coverage within the Loxahatchee Slough due to the County's annual eradication efforts. However, significant stands of Melaleuca still occur on the John Bills property and in Grassy Waters Preserve.

*Page 1-8*

Figure 1-3 should show Pine Glades Natural Area in yellow on the south side of Indiantown Road on both sides of Pratt Whitney Road.

*Page 1-9*

Figure 1-4 shows the County's Limestone Creek Natural Area in light green as State-owned land, this should be changed to yellow as it is county-owned land. In addition, there may be an error with the color of Jupiter Community Park, shown as State-owned land (light green). This may also need to be changed to yellow.

*Page 1-12*

Last sentence of second paragraph under Problems 1, 2, 3, and 4: For clarity, suggest changing the word "restoring" to "restoration of" and adding "to the river" at the end of the sentence.

First sentence of first paragraph under Problems 5, 6, 7, and 8: Suggest adding “that” between “changes” and “have”.

*Page 1-13*

The first paragraph on the page discusses how roads and channelization restrict freshwater flows to the Loxahatchee River. One would infer that water is being retained more in the Grassy Waters Preserve because of the flow restrictions. There needs to be a better explanation of how the reduction in freshwater flow reduces the potential extent of additional viable habitat in the GWP. The nexus is not clear.

*Page 1-14*

In the fourth line of subparagraph 1, change “envelop” to “envelope”.

Subparagraph 2, last sentence: Suggest adding words “on the” between “based” and “relationship”, and add a period at the end of the sentence.

Subparagraph 4, second sentence: “total maximum score achievable” is mentioned but there is no explanation of what this refers to or where this scoring system comes from. More explanation to clarify this point is needed.

*Page 1-15*

Stakeholders, including the County, continue to be underwhelmed with the pace and scale of CERP implementation, constant reinterpretation of CERP’s intent and policy changes that consistently erode CERP’s original authority and intent.

As the reports states, section 601(h) of the Water Resources Development Act (WRDA) of 2000 states “[t]he overarching objective of the Plan is the restoration, preservation, and protection of the South Florida Ecosystem while providing for other water-related needs of the region, including water supply and flood protection”.

Furthermore, section 601(h)(5) of WRDA2000 includes a Savings Clause linking operation of the regional water management system and implementation of CERP to guarantee to preserve existing legally authorized water supplies that existed at the time of WRDA2000 adoption and to provide for future water supply demands through the implementation of projects identified in WRDA2000 and implementing documents.

The County is disappointed that two key overarching Comprehensive Everglades Restoration Plan (CERP) objectives of increasing the availability of fresh water for agricultural, municipal, industrial users and reducing agricultural and urban flood damages were not explicitly included as objectives of the Loxahatchee Plan and instead categorized as potential incidental benefits.

*Page 2-4*

Fifth bullet: Suggest adding the Hungryland Slough Natural Area in the description of the C-18/Corbett Basin. This would be consistent with earlier descriptions of the headwater sources of the Loxahatchee River and Figure 2-2.

*Page 2-5*

Figure 2-2 should include the Pine Glades Natural Area shown in yellow to denote it as County-owned land.

*Page 2-8*

Table 2-1, Future Without Project Conditions column, first row: It is not clear why “and the future with-project conditions, including the amount of freshwater inflow conveyed from project features” is included in the Future Without project description.

*Page 2-10*

Table 2-1, Future Without Project Conditions column, Invasive species row: No acknowledgement is made about efforts made by the County, SFWMD, or the Florida Fish and Wildlife Conservation Commission Invasive Plan Management Section to control non-native/invasive plants or animals on much of this land. Those efforts would continue without the implementation of this project. To say “New invasions and the expansion of invasive plant and animal species currently present would continue in the future without project scenario.” is misleading and not correct. The County’s natural areas are maintained at less than 1 percent aerial coverage of exotic vegetation.

*Page 2-12*

The description of water quality for the existing and future without project conditions should recognize the Loxahatchee River District’s aggressive efforts to convert septic tanks to centralized sewer systems.

*Pages 2-13 and 2-14*

Table 2-1, Noise row: Both in the Existing Conditions and Future Without Project Conditions columns, the Pratt-Whitney complex, where Jet engines are developed and tested, is in the project area between J.W. Corbett WMA and Pal-Mar. Suggest adding this noise source to the description.

*Page 2-16*

Table 2-1, Socioeconomics row: Both in the Existing Conditions and Future Without Project Conditions columns, under the recreation subheading, suggest adding some of the passive recreational activities, such as birdwatching, nature photography, and nature appreciation, all of which have been shown to be a benefit to mental health.

*Page 2-19*

Section 2.6: Jones Creek Restoration is by the Town of Jupiter, not Palm Beach County.

*Page 2-21*

Restoration Strategies assumed that the 45,000 acre-foot L-8 Reservoir, which was a component of the TSP identified during the North Palm Beach County Part 1 Plan Formulation (circa 2011), was constructed and operational for a total of 90,000 acre-feet of storage in this region. Without this amount of storage in the region to capture and redirect excess L-8 Basin stormwater runoff, achieving Everglades water quality requirements will be very challenging. In addition, without this amount of storage in the region, negative impacts to the Lake Worth Lagoon, which receives large volumes of excess stormwater runoff from the L-8 Basin, will continue.

*Page 3-5*

Please provide details, information and reference(s) related to Corps policy guidance that does not support formulation for single purpose water supply measures. Please also provide details, information and reference(s) related to Corps policy that prohibits acquisition of land for protection.

*Page 3-14*

Section 3.4.3.1., fourth line of second paragraph: Insert word “that” between “benefits” and “are”.

*Page 3-15*

Section 3.5.1, first line of this section is the same as the last line of Section 3.5, which is redundant.

*Page 3-19*

The report states, “During refinement of these alternatives [2, 5, 10, 12, and 13], prior to H&H modeling, the PDT screened Alternative 12 from further analysis. The PDT considered the risks posed by constructability concerns, operational complexity and uncertainty, the likelihood of adverse impacts, and high construction and OMRR&R costs all supported the decision to screen Alternative 12.”

Unfortunately, Alternative 12 is the only alternative with both the C-51 Reservoir and natural storage, however, it was screened out due to risks and concerns, complexity and uncertainty, adverse impacts and high costs. Please provide additional information on the specific risks and concerns that are unique to Alternative 12 that justified its removal, as it would seem Alternatives 5, 10 and 13 would have similar risks, concerns, and uncertainty.

*Page 4-20*

Section 4.4, second to last paragraph, first line: Delete the word “was” between “10” and “also”.

*Page 4-21*

Section 4.6 is critical to understanding the performance of refined alternatives. Please provide additional details and information on how the “[p]erformance of the revised alternatives [10R, 13R and 5R] were inferred from the performance of the original, modeled alternatives.”

Is inferring performance from original, modeled alternatives an acceptable Corps methodology for selecting or screening out alternatives? How is this process authorized or approved? How were cost estimates prepared for alternatives 10R, 13R and 5R?

In Section 4.6.1, the description of Alternative 10R mentions watershed benefits but not river benefits. Suggest including a description of river benefits.

In Section 4.6.2, the description of Alternative 13R mentions river benefits but not watershed benefits. Suggest including a description of watershed benefits.

In Section 4.6.2, it appears that “10R” should be “13R” in the following sentence: “However, the cost of Alt 10R is nearly double the cost Alt 5.”

*Page 4-22*

Section 4.6.3, last sentence of paragraph: The word “at” should be changed to “as” between “recommended” and “the”.

*Page 5-4*

Insert a line space between subparagraphs (7) and (8).

*Page 5-14*

Table 5-4, West Indian Manatee Row, Alternatives column: The reference to Alternative 3 in the fifth line should be Alternative 13.

*Page 5-15*

Section 5.5 states that negligible to beneficial long term impacts are expected for State listed species. It seems that if hydrology is improved in surrounding lands of the watershed and sites are generally wetter, this may be a long term negative impact for gopher tortoises (GTs) that may now occur in those habitats. Section 5.6.3 speaks of increased spatial extent of suitable habitat for aquatic amphibians and reptiles, but does not mention potential negative impacts to useable habitat for GTs. Appendix C.2.1 in section C.S.10.9 and on Table C.2-13 does not address this issue directly, but says areas will be surveyed prior to implementation of project features in the PED phase and prior to and during construction to avoid harm to the GTs. There is no mention of the potential need to relocate GTs as their habitat becomes wetter and no longer suitable. There is a potential for some GT relocation costs. It is assumed this cost would come out of the contingencies monies.

Section 5.6, last sentence: The reference to Section C.2.1.4 should be Appendix C.2.1.4, because there is no Section C.2.1.4. Moreover, the last sentence is suggested to be removed because it seems redundant to the second sentence of Section 5.6.

*Page 5-17*

Section 5.6.4, second paragraph, third line: The reference given of Section C.1.3 appears to be incorrect as that Section is found in Appendix C1 and refers to physical landscape. Additionally, the reference given in the sixth line refers to a section that supplies system overview information in Appendix C1. These references need to be corrected.

Section 5.6.5: The reference to the Everglades Mink seems out of place. This subspecies is located in Everglades National Park, Big Cypress Swamp, and Fakahatchee Strand and has not been observed in the northern Everglades or riverine systems in the area for many years. Recommend reference change to river otters in that sentence.

*Page 5-18*

Last sentence of Section 5.7: the reference to C.2 is technically correct, but would be more useful if it was more exact and referred to C.2.9.

Table 5.5 NWFLR FWO row, first line of text: Insert "of" between "period" and "record".

*Page 5-19*

Section 5.9 (Water Quality) refers to Appendixes C.2.1, C.2.2 and Annex F, however C.2.1 is an overview, and C.2.2 deals with climate and sea level rise, while Annex F deals with the exotic and nuisance species management plan. None of these appear to analyze or discuss water quality.

Section 5.9, second paragraph, last sentence: This speaks to existing conditions baseline assumptions for TP and TN concentrations. However, these values are not given nor are they explained as to how they were derived.

Section 5.9 states “Total nitrogen in the system in total daily loads has a slight increase compared to FWO at the limited three sites modeled for nitrogen while at the same time have a decrease in concentration. This is likely a result of increased flow into the system and not reflective of new nutrient input.” How was this determination made? With slight increases of daily loads of nitrogen with the alternatives, how does one conclude that water quality will improve and not be degraded?

*Page 5-22*

Section 5.10 refers to Appendix C.1.15 which is hazardous, toxic or radioactive wastes but instead should refer to Appendix C.1.14 which is air quality.

Section 5.10, last sentence of first paragraph: Suggest adding clarification language that no proposed equipment in the various alternatives will be powered long-term by engines with an exhaust.

Alternative 5R, which results in the conversion of former agricultural land on the Mecca site to the deep C-18W reservoir with 18.5 foot embankment heights, is a substantial change that will affect the aesthetics experienced by adjacent land owners and other stakeholders. This fact warrants additional details and information regarding aesthetic impacts.

Section 5.10, suggest being more exact with Appendix citation and change to C.2.14. There are many issues with Appendix citations in the document that are incorrect or not sufficiently specific. Suggest a thorough review and correction of all the references to the Appendixes and Annexes for accuracy.

*Page 5-23*

Alternative 5R, which results in the conversion of former agricultural land use on the Mecca site to the deep C-18W reservoir with 18.5 foot embankment heights, is a substantial change in land use that will affect adjacent land owners and warrants additional details and information.

There are several references to tables that are missing table numbers, e.g. “Table 5-”.

*Page 5-24*

Table 5-8: The total for acres improved for Alternative 13 appears incorrect. Adding the various acre totals for NAT, the total would be 14,200, not 13,803. It appears the NAT acres for Grassy Waters were not included. However, the grand total of acres for Alternative 13 appears correct

*Page 5-25*

Section 5.15: The one sentence statement begs the question of what was the results of the comparison. Suggest a follow-up sentence stating the results are presented in the following subsections 5.15.1 and 5.15.2.

Section 5.15.2: Discussion is mostly about losses of economic activity by either agriculture or housing construction. There is no discussion about the potential for increased ecotourism activity on the restored natural area lands or on the Wild and Scenic Loxahatchee River with a restored flow and enhanced flood plain envisioned by the alternatives. Is this economic activity considered negligible? Restored natural lands and enhanced river conditions will likely stimulate a significant increase in tourists coming to Palm Beach and Martin County to enjoy the beauty of the natural lands.

*Page 5-26*

There are several references to tables that are missing table numbers, e.g. “Table 5-”.

*Page 5-27*

There are several references to tables that are missing table numbers, e.g. "Table 5-".

Section 5.15.4: Appendix reference appears incorrect.

The last sentence in the Flow-way 2 row of Table 5-10 appears to be missing some text.

*Page 5-30*

Section 5-18, third line of paragraph: The word "decedents" should be changed to "descendants".

*Page 6-1*

The page numbers for the Section 6 Table of Contents pages need to be corrected.

*Page 6-2*

Figure 6-1: As mentioned above, the TSP Figure shows the west leg C-18 Weir as a proposed structure. It is an existing structure, so per the legend, it should be shown as a red circle with a black dot in the middle. Nothing in the description on the left of the Figure mentions a proposed rebuild of that structure.

*Page 6-2*

Section 6.1.1.1: The paragraphs that discuss the G-161 and G160 structures should be consistent about the way they are presented. They currently describe one as a "will be" structure (G161) and one as an "is" structure (G160). It was our understanding that in this PIR, these structures were to be considered as if they were not yet built. Is that correct? If so, both should be presented as "will be" or "will do" structures.

*Page 6-3*

Section 6.1.1.2 describes a 300 cubic feet per second (cfs) intake pump pumping available water from the C-18W Canal into the reservoir. This pump location is of serious importance to the County due to concerns regarding the timing of when water will be considered available for pumping. Excessive pumping at this location could cause drawdowns of water levels in the wetlands in the Hungryland Slough Natural Area immediately north of the C-18W Canal due to groundwater seepage into the C-18W Canal from the natural area. The timing and duration of this proposed pumping will need to be monitored closely to avoid negative impacts to Hungryland Slough Natural Area.

*Page 6-4*

The third paragraph states that a 250 cfs pump station will pump water from the western seepage canal into the C-18W Reservoir. Combined with the 300 cfs inflow pump station, the total inflow capacity would be 550 cfs while the total outflow capacity is approximately 300 cfs. Is this correct?

Section 6.1.1.2 appears to state that each Aquifer Storage and Recovery (ASR) well will be able to recover 5 million gallons per day (MGD), equivalent to the inflow capacity of 5 MGD, which equates to 100 percent recovery efficiency. This assumption seems overly optimistic and perhaps disingenuous. Please clarify the ASR well recovery efficiency assumption and provide justifications for the assumption.

Section 6.1.1.2, first line of the last paragraph: Suggest inserting the word "with" between "co-located" and "the".

*Page 6-6*

The report incorrectly states that the M Canal is owned in fee by West Palm Beach County. This should state that the M Canal is owned by the City of West Palm Beach.

*Page 6-7*

Section 6.1.2.1 states project needs the land in fee, but PBC owns land and if PBC cannot give fee, then PBC can enter into CERP Master Agreement Article III (CMAA III) agreements. There may be some concerns with potential conflicts of such an agreement and County funding partner agreements or the County's Conservation Lands Protection Ordinance, because PBC may be required to give up certain rights to the land for the project. This potential conflict could hold true for any County natural area land needed for this project.

*Page 6-9*

Section 6.1.2.3 Kitching Creek: The last sentence is incomplete. Need to add words such as "will be necessary" or "is an option to acquire the needed interest in the land".

Section 6.1.2.3, Mack Dairy Spreader Swale: The first sentence is incorrect as not all of the land south of Cypress Creek Canal in the footprint of the proposed spreader swale is owned by the County. A portion of the land is in Martin County and co-owned by Martin County and SFWMD. This will alter your write-up for acquisition need for the Fee interest required for the project.

*Page 6-13*

Figure 6-3: Recreation project C refers to a connection to the Ocean to Lake Trail, but that trail is located much further to the north, going east-west through the J.W. Corbett WMA. The County has some issues with this proposal. This description sounds like a proposal from the SFWMD to move the County's proposed trail system from the west side of the L-8 Canal to the east side of the L-8 Canal. This is to make the connection from J.W. Corbett WMA to the Loxahatchee National Wildlife Refuge and ultimately connect along the L-8 Canal to the County's trailhead at Lake Okeechobee Scenic Trail near the Palm Beach County and Martin County line. Palm Beach County has been in lengthy multi-year discussions with SFWMD on this subject and issues have not been resolved. If this bridge were relocated to cross the L-8 Canal at the southern extent of the J.W. Corbett WMA, the County might find this a more acceptable option.

*Page 6-16*

Section 6.2.3, third line: Suggest adding "and nature appreciation which can facilitate mental well-being", after the word "aesthetics". This would acknowledge the current literature indicating that being in and around nature assists with mental health.

*Page 6-23*

Table 6-5 provides an annual cost for invasive species during the OMRR&R phase and a cost for annual monitoring of invasive species for a total of \$583,000 (also given in Table 6-10 on Page 6-29). The acreage footprint of where these funds would be expended is not mentioned or made clear. The County suggests these costs appear too low. The County expends almost \$2 million annually just to maintain exotic vegetation to less than 1 percent aerial coverage in the Loxahatchee Slough Natural Area. Since the Loxahatchee Slough is considered an area to be impacted by the restoration efforts of this project, would the annual funds shown in the tables be available for use in the Loxahatchee Slough? The interaction between this project's OMRR&R costs and those expended by other governmental agencies on lands impacted by the project is not sufficiently clear in this section, nor in Sections 6.4.4 on Page 6-27, or

Section 6.4.5 on Pages 6-28 and 6-29. Section 6.4.4 states “The LRWRP AM and Monitoring Plan leverages several existing programs to avoid redundancies and insure cost-effectiveness. The monitoring requirements described in the LRWRP plan are limited to the additional increase in monitoring resources and analysis efforts needed to address LRWRP-specific questions. The LRWRP monitoring plan assumes these other monitoring efforts will continue into the future at least for the period required by LRWRP.” However, what these existing programs are, or whether they are confined to SFWMD and the Corps or other State or Federal programs, or include local government monitoring and maintenance activities, is not made clear. No mention of coordination with other governmental agencies relative to invasive exotic species control costs is mentioned in the Section 6.4.5 (Invasive Species Management).

*Page 6-30*

Section 6.5 and Table 6-12: The method of calculations to reach the values given in Table 6-12 were not sufficiently explained. How was the Unit Day Value derived, or where did it come from? How was the daily use number of 60 derived? There needs to be more explanation of the calculations to make the information in the Table 6-12 more meaningful and acceptable.

*Page 6-31*

Section 6.6.1: The first two sentences appear redundant, suggest deleting the second sentence.

*Page 6-32*

Section 6.6.5: The last two sentences of the section state that a PPCA will be initiated between the SFWMD and the Corps prior to federal funding appropriations approval for the project. Is it correct to assume that this will occur after the project is federally authorized and before appropriations are approved by Congress? There is a concern that if large amounts of funds are expended by the SFWMD on design and construction, they may never get the federal cost share, if the funds are never appropriated.

*Pages 6-34 and 6-35*

Section 6.7.1 and Figure 6-4: The last paragraph of the section mentions the design and construction of some of the western features (including modifications to G160 and G161) will be pushed out to years 7 and 8 of the unconstrained (perhaps this should read constrained) project timeline. However, this statement conflicts with the fourth paragraph of the section that says all features will start PED in the first year and Figure 6-4 for the unconstrained timeline shows PED and Construction beginning in years 1 and 2. Figure 6-5 for the constrained timeline shows PED for the G160 & G161 beginning in year 9. These inconsistencies need to be corrected.

*Page 6-36*

Section 6.7.2, First paragraph mentions an exploratory borehole that will be completed as the first ASR well. Suggest that this sentence have some form of caveat, that assuming the exploratory borehole does not uncover problematic issues, the borehole will be converted and completed as the first ASR well. The sentence as written makes the reader wonder why an exploratory borehole is needed or what information it will provide, if you intend to complete it as an ASR well, seemingly no matter what is found.

*Page 6-41*

Section 6.8.1 shows an example of a stage duration curve for the south point on the Mecca site. It indicates higher groundwater stages, but no issues for increased surface waters to contribute to area flooding. However, there is no discussion of how raised groundwater in the area may affect the operation of septic systems in the rural residential area adjacent to the site. Is this potential issue addressed anywhere else in the report?

*Page 6-48*

Section 6.8.6 mentions Grassy Waters Preserve and the Water Catchment Area, giving the impression that these are two separate areas. However, those two areas are one and the same. Suggest putting parentheses around Water Catchment Area and including aka, in front of the title (aka Water Catchment Area). Also suggest adding Hungryland Slough Natural Area as a water source to the project.

*Page 6-50*

Section 6.9: Suggest more explanation as to how and why the Loxahatchee Project precludes several proposed CERP projects given in the paragraph. Does this mean those projects will no longer be considered, or just no longer considered for the restoration of the Loxahatchee River Watershed? Or perhaps this is a typo, and you meant “Additionally, LRWRP does not preclude other CERP components...”

*Page 6-51*

Section 6.10.2 explains some additional analyses relative to the C-18W reservoir that are not yet complete, but that will be included in the Final PIR. Is it possible that these analyses could change the feasibility of constructing the reservoir? Or could the additional analyses result in the cost of the reservoir to increase such that the cost/benefit ratio no longer favors this option for an alternative? If that should occur, would that not alter the conclusions about which alternative is the TSP? Perhaps some language needs to be added to explain what would occur if the analyses show major problems that will be very expensive to overcome.

*Page 7-7*

Table 7-1, NEPA 1969 row: Suggest adding the date that the Notice of Availability of the Loxahatchee Project Draft PIR/EIS was published in the Federal Register and started the 45-day review period.

*Page 7-11*

Section 7.3, fourth paragraph, first sentence: Suggest deleting the last phrase of the sentence as it appears clear from the first part of the sentence that there would be no cost to the Federal government. Moreover, the second sentence also seems redundant or could be combined with the first sentence to say all current and future costs associated with the residual agricultural chemicals is the responsibility of the non-Federal sponsor.

*Page 7-13*

Please include references to water quality treatment performance literature values assumed for reservoirs, shallow impoundments, and ASR wells.

*Page 8-1*

Section 8 second paragraph: The language “three components of CERP” appears to conflict with what is stated in Section 6.9 which states two components of CERP.

*Pages 8-6 and 8-7*

Due to the uncertainty regarding achievement of water quality standards related to ASR well operations, please provide additional information regarding the potential risks and related costs that may be incurred to address applicable water quality standards as it relates to ASR well operations. In other words, what water quality treatment facilities would be needed and what capital and operations and maintenance costs would be incurred to achieve water quality standards to enable ASR well operations consistent with Alternative 5R.

Section 8.2 subparagraph (4) mentions cost sharing remediation costs to satisfy surface water quality standards for potentially contaminated waters from the ASR wells. It states costs will be shared if it is "...economically feasible within the scope of the original project". Please explain what happens if the costs to bring the stored water from the wells into compliance with the surface water quality standards are determined to not be economically feasible? Will the ASR be abandoned? Will this preclude the TSP from meeting its flow targets? Will these questions be answered by the exploratory borehole? Something could certainly occur in the future when all wells are built and operational, if a problem arises with the water quality from the water from the aquifer mixing with the pumped in surface water. If surface water quality standards cannot be met and it is determined to be too costly to treat the water to make it useful for the project, what happens? Has this potential scenario been discussed elsewhere in this report?

In addition, please provide details and information on the performance of Alternative 5R without the four ASR wells. In other words, please prepare a sensitivity analysis to better understand Alternative 5R with no ASR wells.

During project planning, stakeholders expressed concern regarding the proposed ASR well recovery efficiency of 70 percent as being too optimistic based on historical performance of the West Palm Beach ASR Well. Please conduct sensitivity analyses to understand the potential impacts of lower ASR well recovery efficiencies (e.g. 25 – 50 percent).

## Appendices

Headers, section numbers and page numbers do not seem to be correct at various locations throughout the Appendices. PDF page numbers are provided in parentheses with the comments below to assist in preparing responses.

### Appendix A – Engineering

*Page Appendix B-7 (PDF page 14 of 642)*

Section B.2 includes structures of regional importance including G-92, S46, and the Lainhart and Masten Dams. Are these structures appropriate for Flow-way 2? They are not included in the referenced Figure 3 showing structures for Flow-way 2.

*Page Appendix B-9 (PDF page 16 of 642)*

Section B.2.1, second paragraph: Suggest including J.W. Corbett WMA as source of water for C-18W because of drainage from the western terminus of the C-18W Canal in the WMA.

*Page Appendix B-11 (PDF page 18 of 642)*

Section B.2.2 appears to state that each Aquifer Storage and Recovery (ASR) well will be able to recover 5 million gallons per day (MGD), equivalent to the inflow capacity of 5 MGD, which equates to 100 percent recovery efficiency. This assumption seems overly optimistic and perhaps disingenuous. Please clarify the ASR well recovery efficiency assumption and provide justifications for the assumption.

In addition, the section states the water for pumping into the aquifer will come from the seepage canal and the waters from the Corbett structure and the M-O connector canal. Is there no water (other than seepage losses) from the Reservoir also used to pump into the aquifer? Suggest adding further details of the operation and interaction of the ASR wells and the reservoir.

*Page Appendix B-22 (PDF page 29 of 642)*

Section 2.4.2.5, Last sentence of last paragraph: change “westward” to “eastward”.

*Page Appendix B-22 (PDF page 29 of 642)*

Section 2.4.2.6 describes the existing C-18W weir, but does not discuss the proposed relocation and increased control elevation of the weir that was envisioned in Alternative 13. Suggest including the description of that proposed modification. Without that description, the last sentence of the section does not make sense.

*Page Appendix C-23 (PDF page 30 of 642)*

Regarding Section C.1.1, the County, in collaboration with local, state and federal partners, acquired countywide Light Detection and Ranging (LiDAR) Survey Data in October 2018 (that was flown in 2016). Please contact SFWMD’s Christine Carlson at [ccarlso@sfwmd.gov](mailto:ccarlso@sfwmd.gov) to obtain the data.

*Page Appendix C-26 (PDF page 33 of 642)*

Figure 7: The labeling of the Loxahatchee Slough in the area west and south of the PBC North County Airport is misleading. Suggest the label be changed to Avenir preserves.

*Page Appendix C-30 (Page 37 of 642)*

Please explain how a 36 percent recovery efficiency at the C-18 Test ASR Well site tested in 1976 translates to future larger-capacity ASR performance with high recovery efficiency. Also, please define what “high recovery efficiency” means in terms of percentage.

Please provide historical recovery efficiency information for the West Palm Beach ASR Well.

Please provide details and information on what analyses were conducted to address the Town of Jupiter’s concerns provided during project scoping regarding the use of ASR in the Floridan Aquifer near the Town of Jupiter and the potential for degradation of their water supply source (as documented on page C.3-14 [PDF page 378 of 642]).

*Page Appendix C-32 (PDF page 39 of 642)*

Section C.4.2, states “However, with increased discharges proposed from the C-18W Reservoir, it is possible that the C-18W Canal may need to be widened or deepened”. This possibility has several concerns due to buried water lines along that ROW, the potential road connections planned by the Avenir development, as well as the railroad bridge west of the Bee Line Highway. It could also impact the design of the weir just east of the Bee Line Highway and have a potential impact on drainage and water control structures from the Hungryland Slough property to the north. Suggest this discussion mention these constraints on the canal.

*Page Appendix C-33 (PDF page 40 of 642)*

Table 4: The large culverts from the Culpepper Ranch area into the Ranch Colony Canal are not listed. There was discussion about the potential to modify those with telemetry to automate their operations. If that is correct, would that culvert need to be added to the Table?

*Page Appendix D-49 (PDF page 56 of 642)*

Section D.3 states “The HEC-RAS model for Flow-way 3 is still in development, and existing model runs are preliminary. More detailed model simulations will be run and results reported in the final Engineering

Appendix". There is concern that these final results may significantly alter some performance measures in Flow-way 3 of the TSP.

*Page Appendix D-60 (PDF page 67 of 642)*

Figure 23 appears to show that the simulated average annual ASR recharge is 6,302 acre-feet and the simulated average annual ASR recovery is 5,897 acre-feet which equates to an effective average annual recovery efficiency of 93.6 percent. Please clarify how this annual average efficiency can be expected to occur despite an ASR recovery efficiency assumption of 70 percent (per page Annex D-52).

## Appendix B – Cost Engineering and Risk Analysis

*Page 2 (PDF page 87 of 642)*

Section 1.1.1 states "A formal risk analysis will be conducted later to establish the contingency for the preferred plan." Suggest that some time frame for what is meant by "later" should be given. Is it prior to final PIR, or during PED?

Section 1.1.2: Suggest that a timeframe be given for when this cost estimate will be finalized.

Section 1.1.5: Suggest providing an explanation as to why the O&M costs were presented in the Economic Analyses instead of in the cost estimates section.

*Pages 2 and 3 (PDF pages 87 and 88 of 642)*

Section 1.1.6: Suggest providing some idea of when the schedules will be prepared, not just a nebulous "later". Will it be before the final PIR, or during PED?

*Page 3 (PDF page 88 of 642)*

Section 1.1.7: The acronym "MII/MCACES" is used here, but in Section 1.1.2, it is shown as MCACES/MII. Are these the same? If so, make consistent throughout document. Additionally, please provide some idea of when the Total Project Cost Summary (TPCS) will be prepared. This section refers to it as something to be done in the future, but does not provide details. Also, please define what is meant by "TSP refined."

Section 1.2.1: Please explain what is meant by "among other improvements" in the alternative descriptions.

*Page 4 (PDF page 89 of 642)*

Section 1.2.2: The notes for Table 1 (e.g. Note #2) refer to the "Budget Project Cost", but that cost is not presented in the Table, only the Budget Construction Cost is shown. Suggest making the notes refer to the data on the table.

Section 1.2.3: Please explain what TSP Refine means (it is not in the Glossary of the PIR) and when it occurs.

Section 1.3:

This is incomplete and needs to be updated because the Draft PIR/EIS provides a TSP.

*Page 5 (PDF page 90 of 642)*

Section 1.3.1, please provide a timeline for when the analysis will be completed for the TSP. If this has already occurred, need to update this section.

Section 1.3.2 has the same title as Section 1.2.4. Is the information provided here the same as the information given in Section 1.2.4, but just worded differently? If so, suggest deleting this section.

*Page 6 (PDF page 91 of 642)*

Section 1.5.1: In the last sentence of the first bullet, change “shables” to “tables” and provide a more exact reference to which tables in Appendix A (or should this read Attachment A?). The second bullet needs a definition of “TSP Refine” and a potential update of this bullet, if the analyses has already occurred for the TSP.

Section 1.6 has the same title as Section 1.1.7 and appears to give much of the same information but perhaps in more detail. Suggest deleting one of the sections as redundant.

Section 1.6.1: TSP Refine definition needed, and third sentence needs to give a more exact reference to tables in Appendix A.

Section 1.7: Define “ATR”.

*Pages 7 – 11 (PDF pages 92 – 96 of 642)*

The clarity of the blue font in the Attachment A table is poor and difficult to read. In addition, why are there no other construction costs on the tables for Alt 5 and Alt 5R, when all the other alternatives include costs on that line? Would this provide a potentially false lower cost for Alt 5R (the TSP)?

## Appendix C.1 – Existing and FWO Project Conditions

*Page C.1-1 (PDF page 103 of 642)*

Section C.1.1, first paragraph, second to last sentence: Suggest adding the Hungryland Slough Natural Area to the list of undeveloped key natural features. This would make it consistent with the first sentence of the third paragraph.

*Page C.1-3 (PDF page 105 of 642)*

Delete the redundant word “of” before “thereof” in the last sentence of the first paragraph on the page.

Section C.1.2.1, last paragraph, sixth sentence: Suggest removing language “characterized anomalous cooling of the waters in the equatorial Pacific Ocean” as it is redundant with the fifth sentence.

*Page C.1-8 (PDF page 110 of 642)*

Section C.1.4.2, first sentence: The information given here seems to indicate that the rock mining at Palm Beach Aggregates near the L-8 Canal is outside the study area. This conflicts with the study boundaries shown in Figure 1-3 and the information given in the geology bullet of Section 5.2 (Physical Landscape).

*Page C.1-10 (PDF page 112 of 642)*

Section C.1.5.1: The second paragraph on the page discusses geotechnical analyses for slope stability, “A preliminary slope stability analysis was performed using Slope/W (GeoStudio; Calgary, Canada) to evaluate the excavation configuration for a flow-way across the C-18W footprint. This slope stability analysis supported flow-way design, not a reservoir embankment as is currently proposed. “The following two paragraphs discuss further geotechnical studies in the areas of the proposed embankment and mention transmissivity rates of the existing conditions, but offer no statements as to the suitability of the

soils for the proposed impoundment of the TSP. Perhaps that information is supplied in Appendix C-2, but would be appropriate to include in this section.

*Page C.1-12 (PDF page 114 of 642)*

Section C.1.7.1, fourth paragraph, second sentence: The Loxahatchee Slough Natural Area, managed by the County, is almost 13,000 acres (12,957); please correct.

*Page C.1-61 (PDF page 163 of 642)*

Section C.1.12.1.2: This subsection is part of the Existing Condition descriptions of Section C.1.12.1 for hydrology, but has a discussion about the C-18W Reservoir and 4 ASR wells flowing water by “a pump station to overland flow northeastward across the Mecca natural storage area, through the improved Beeline culverts and bridge orifice, to the C-18E”. This information is incorrect and inappropriate for the existing condition description.

*Page C.1-62 (PDF page 164 of 642)*

Section C.1.14.1: This subsection number is incorrect (no section C.1.14. provided) and should be C.1.13.1.

*Page C.1-72 (PDF page 174 of 642)*

Section C.1.14.2: Section number should be C.1.13.2. It is immediately followed by Section C.1.14 Air Quality on that same page.

*Page C.1-73 (PDF page 175 of 642)*

Section C.1.14.1, second sentence: Add the word “on” between “based” and “six”. In the last sentence of the section, change the word “are” to “area”.

*Page C.1-75 (PDF page 177 of 642)*

The last row in Table C.1-12 states the location is in Flow-way 3 of the project, but then describes the HTRW issue as being on Mecca Farms, which is in Flow-way 2.

*Page C.1-79 (PDF page 181 of 642)*

Section C.1.16.1: The second sentence of the second paragraph states “There are no significant noise generating land users within these areas”. Suggest adding the Pratt Whitney complex located northeast of the J.W. Corbett WMA, a jet-engine testing facility along the Bee Line Highway, and the North County Airport as they are likely considered significant noise generators in Flow-way 2.

*Page C.1-81 (PDF page 183 of 642)*

Section C.1.17.2 states what the restoration of the Loxahatchee Project will do for the study area. These paragraphs appear in the wrong section/Appendix and are inappropriate for the FWO project conditions section. Suggest they be moved to Appendix C-2.

*Page C.1-82 (PDF page 184 of 642)*

Section C.1.18.1 describes land use in the central portion of the project area, but does not mention the natural lands of the Hungryland Slough and Loxahatchee Slough Natural Areas, nor those of Grassy Waters Preserve, which make up a significant amount of area. Suggest this omission be corrected.

*Pages C.1-86 and C.1-87 (PDF pages 188 and 189 of 642)*

Section C.1.18.2 discusses the projection for land use in the southeastern portion of Martin County and Figure C.1-27 shows proposed urban land uses in the Cypress Creek area of the project. There is no

mention of contractual restrictions on these lands that were put in place upon their acquisition. Those contractual obligations would preclude, or at least greatly hinder any attempt to declare the lands surplus if the project was not implemented. Moreover, the County land use designation for the Cypress Creek, Pine Glades, and Hungryland Slough Natural Areas is conservation land as part of the County's Natural Areas Program. These lands are highly protected from development by the Conservation Lands Protection Ordinance. Suggest re-evaluating this area and the map to possibly show more natural lands in FWO than a conversion to urban.

*Page C.1-88 (PDF page 190 of 642)*

Section C.1.19.1: The first sentence of the second paragraph has a poor description of the County's Jaega Wildways (formerly known as Northeast Everglades Natural Area or NENA) trail system that uses Riverbend Park as a hub for the four multi-purpose trails named the Jesup, Historic Jupiter to Indiantown, Bluegill, and Pantano trails.

*Page C.1-90 (PDF page 192 of 642)*

Section C.1.19.2: The second paragraph is redundant and exactly the same as the fifth paragraph in Section C.1.19.1 on page C.1-88.

Section C.1.19.2: Suggest adding a caveat that the SCORP tables used are from 2013, and several things have changed in the area in the last 6 years. The County's natural areas have opened new public use facilities for canoeing/kayaking with trails and freshwater fishing at Cypress Creek, Pine Glades, and Winding Waters Natural Areas, and facilities are under construction for a canoe/kayak trail and freshwater fishing facilities at the Loxahatchee Slough Natural Area. The Limestone Creek Natural Area also provides a canoe/kayak launch area.

*Page C.1-93 (PDF page 195 of 642)*

Section C.1.20.1.3: Correct the table reference error.

*Page C.1-97 (PDF page 199 of 642)*

Section C.1.21.1: Correct the incorrect section reference in the first sentence.

Sections C.1.22.1 and C.1.22.2 are not consistent with the presentation in the other sections of this Appendix. Suggest their order be reversed (i.e. Existing Condition provided prior to FWO). This would follow the pattern of previous sections.

*Page C.1-100 (PDF page 202 of 642)*

Section C.1.22.3: Second paragraph is redundant to the eleventh paragraph of Section 1.22.2.

*Page C.1-108 (PDF page 210 of 642)*

Section C.1.24.1.2: Suggest changing the location of the Gwinn airport from "24 miles south of Jupiter" to "24 miles west of Jupiter".

Section C.1.24.1.2 describes the location of Br Ranch airport. This refers to the old Burt Reynolds ranch, which has been sold and development of the property is underway with roads, ponds, and a couple of houses. The airport no longer exists. This section should state "was" a private airport instead of "is" a private airport. The current state of the property should be stated for the existing condition and in Section C.1.24.2.2.

*Page C.1-109 (PDF page 211 of 642)*

Section C.1.25.1: The second to last sentence in the third paragraph is incomplete and provides no data about the two Jupiter wells RO5 and RO6. Please provide the data and complete the sentence.

*Page C.1-110 (PDF page 212 of 642)*

Section C.1.25.2: The last sentence in the first paragraph is written to say “demands will be met by LRWRP features” but does not state what those demands are. This sentence appears inappropriately placed in the section of FWO conditions. Also, the sentence ends with a comma instead of a period. Suggest deleting this sentence and providing information on how future water demands will be met without the project.

## Appendix C.2 – Effects of the Alternatives and Tentatively Selected Plan

*Page C.2-3 (PDF page 227 of 642)*

Section C.2.2: First sentence of fourth paragraph states study results are pending, but no timeline is given for when the results are expected. This same issue is presented in the fifth paragraph which gives no timeline for when CH3D modeling will be completed. Please provide an expected timeline.

*Page C.2-4 (PDF page 228 of 642)*

Section C.2.3, second paragraph: See comment on Section C.1.18.2 above - same idea applies for the language about pressure to surplus the lands in this paragraph.

*Page C.2-6 (PDF page 230 of 642)*

Section C.2.4, second sentence. See comment on Section C.1.5.1 above on mining in the project area.

*Page C.2-8 (PDF page 232 of 642)*

Table C.2-2 is supposed to be a comparison of FWO to the Alternatives for hydric soils, but there is no column for the FWO in the table. Additionally, it is unclear why Alternatives 2, 5R, and 10 show no hydric soils for Hungryland Slough. Figure C.2-1 shows hydric soils in the Hungryland Slough Natural Area. Is the table only showing proposed increases in acreage?

Section C.2.6: First paragraph reference to Table C.2-36 is a typo and should be Table C.2-3.

*Page C.2-10 (PDF page 234 of 642)*

Section C.2.7: First paragraph reference to Table C.2-3 should be to Table C.2-4. Suggest all references to Figures or Tables be rechecked for accuracy throughout all documents.

*Page C.2-16 (PDF page 240 of 642)*

Section C.2.7.1: Last paragraph on the page discusses the CH3D modeling as having been completed and giving results. This conflicts with text in Section C.2.2.

*Page, C.2-23 (PDF page 247 of 642)*

Table C.2-6: The County has concerns that all alternatives appear to show a decrease in the number of days of inundation duration for the southwest portion of the Loxahatchee Slough (indicator Regions LS-8 and LS-9). This could lead to a reduction of ephemeral wetlands or a drying of current wetlands in that area. What can be done to supplant this water loss?

*Page C.2-25 (PDF page 249 of 642)*

Paragraph at top of page needs bold font removed and changed to full justification. The last sentence in the paragraph is incomplete, suggest deletion.

Section C.2.8: Last two lines on the page, the text states information is found elsewhere in the report and is not repeated here. This is a good technique and this approach should be used much more often in this report. It would reduce the size of the document and the tedium of reading the same information over and over in different sections of the whole document.

*Pages C.2-27 – C.2-34 (PDF pages 251 – 258 of 642)*

Table C.2-8: Add explanations for acronyms/codes used in the “USACE Determination” column.

*Page C.2-35 (PDF page 259 of 642)*

First sentence at top of page states that the panther and bonneted bat will not be included on the following table, because they are not found in the project area. However, the panther and bonneted bat are in Table C.2-9 and the results show negative impacts to the panther for all locations. This is misleading and inconsistent and Table should match the text.

*Page C.2-41 (PDF page 265 of 642)*

Spell out SNKI.

*Page C.2-50 (PDF page 274 of 642)*

Table C.2-12: The row for the southeastern American kestrel uses an acronym of “KMUs”. This needs to be defined in the notes below the table.

*Page C.2-52 (PDF page 276 of 642)*

Section C.2.10.8 states the American Alligator is federally listed as a threatened species. Why is it not included in Table C.2-8?

*Page C.2-55 (PDF page 279 of 642)*

Section C.2.11.4.1: First sentence needs a period between “Act” and “USACE”. Also, the first few sentences are redundant to information given in the second paragraph, suggest combining information into one paragraph.

*Page C.2-56 (PDF page 280 of 642)*

Section C.2.11.4.1: The number of Figure C.2-7 appears incorrect and out of order with other figures.

*Page C.2.63 (PDF page 287 of 642)*

Figures C.2-17 and C.2-18 are stage duration curves that are almost impossible to read either electronically or as printed out on paper. The text is too small and it is difficult to review the differentiations for the various alternative. Suggest increasing the size of the key and making the 2070B (FWO) with a different symbol than dashed lines.

*Page C.2-75 (PDF page 299 of 642)*

Paragraph at bottom of page, second sentence: Should state indicator regions are north of “Northlake Boulevard” not “lake boulevard road”.

*Page C.2-78 (PDF page 302 of 642)*

Information on total phosphorus and total nitrogen removal rates within ASR wells is provided, but no information on assumed recovery efficiency is provided. Please provide ASR recovery efficiency assumptions and provide justifications for those assumptions in the main report.

*Page C.2-87 (PDF page 311 of 642)*

Paragraph at bottom of page, second sentence: Delete word “to” between “similar” and “for”.

*Page C. 2-94 (PDF page 318 of 642)*

Section C.2.13.1: First paragraph, second sentence: Has the documentation from Pat Painter been supplied, if not, when? Second to last sentence of that paragraph, delete the word “for” after “reservoirs”.

*Page C.2-96 (PDF page 320 of 642)*

Table C.2.-28: The table has 4 superscripts shown in red denoting references, but there are no references or citations given in a key for the table. Please provide the corresponding references or notes.

The sentence immediately below Table C.2-28 refers readers to Table C.2-30 for a comparison of Alt 10 to the FWO. Alt 10 should read Alt 13.

*Page C.2-99 (PDF page 323 of 642)*

The figure labeled C.2-46 (not sure if it should be C.2-43 as stated in text) is flipped and all text is backwards.

*Page C.2-101 (PDF page 324 of 642)*

Section C.2.14 discusses air quality and states there will be a “slight temporary decrease in emissions and particulates from construction” for the FWO alternative. However, in the socioeconomic sections there was projection of increased urbanization in the watershed if lands were not used for this project. Increased urbanization would cause a long-term increase in emissions and particulates in the FWO, correct? It would be appropriate to discuss that scenario and possibility in this section.

The second sentence (Maintenance areas.) in the paragraph immediately below Table C.2-31 is incomplete and needs to be deleted or expanded.

The first sentence in the paragraph at bottom of the page refers to “the issues and further investigations...” but does not identify or provide any summary of what the issues are and where the investigations are occurring.

*Page C.2-102 (PDF page 236 of 642)*

Section C.2.18: In the first sentence, “LOWRP” should read “LRWRP”. In addition, the second sentence should be expanded. Local governments own many of the lands in the project area, whether County (Loxahatchee Slough, Pine Glades, and a large portion of Cypress Creek drainageway) or municipal lands (Grassy Waters Preserve). These entities should be acknowledged in this section.

*Pages C.2-103 – 105 (PDF pages 327 – 328 of 642)*

Table C.2-32 and C.2-33 appear to provide the same information and are redundant. Suggest deleting one of the Tables.

*Page C.2-108 (PDF page 332 of 642)*

Section C.2.18.3: The last sentence of the section is likely inaccurate. Alt 13 proposes major culverts across the CSX Railroad and the Beeline Highway to deliver water into the Loxahatchee Slough. These culverts would require significant modifications.

*Page C.2-111 (PDF page 335 of 642)*

Section C.2.21.4: "Error! Reference source not found." after second sentence.

*Page C.2-112 (PDF page 336 of 642)*

Section C.2.22: The acronyms ROD and APE need to be spelled out. And "LOWRP" should be "LRWRP".

*Page C.2-114 (PDF page 338 of 642)*

Section C.2.22.4: "Error! Reference source not found." in second paragraph.

*Page C.2-116 (PDF page 340 of 642)*

Section C.2.22.5: Add "Creek" after "Kitching" in first sentence.

*Page C.2-120 (PDF page 344 of 642)*

Section C.2.22.11: The first paragraph discusses elements associated with the L-8 Shallow storage feature. In the second sentence, components listed include an ASR well adjacent to the City of West Palm Beach Lake Mangonia. That item does not appear in any of the alternatives that proposed the L-8 Shallow Storage feature. Only Alt 13 had ASR wells associated with the L-8 Shallow Storage feature and they were located on the west side of the storage feature impoundment.

*Page C.2-121 (PDF page 345 of 642)*

Section C.2.22.15: In the first sentence, "Grass" should read "Grassy".

*Page C.2-129 (PDF page 353 of 642)*

Table C.2-38: The Loxahatchee Slough Natural Area row states in column "Distance to Airport AOA" (need definition of AOA) "0.1 mile E". That should read "0.1 mile W". Column heading says "Distance to airport AOD", but it appears many of the entries are given as miles "from" the airport AOA. Suggest avoiding this confusing issue by dropping the compass directions and keeping just the distance in miles as done in the first few rows of the table.

*Page C.2-131 (PDF page 355 of 642)*

Section C.2.25, fifth paragraph, last sentence: Insert the word "of" between "severity" and "water".

*Page C.2-135 (PDF page 359 of 642)*

The last section of Table C.2-40 is missing significant information and states "To be inserted". Please insert missing information.

## Appendix C.4 – Environmental Compliance Information

*Page C.4-1 (PDF page 392 of 642)*

Section C.4 discusses Environmental Laws, Statutes, and Executive Orders relating to the project. It seems prudent to include potential County or municipal ordinances that could affect the project as the generic statement "project construction and implementation will comply with all pertinent local codes and ordinances" seems inadequate.

*Page C.4-18 (PDF page 409 of 642)*

Section C.4.39.8.5.3: The first paragraph is an exact duplicate of Section C.4.39.8.5.2. Suggest deleting paragraph and just refer to Section C.4.39.8.5.2 in a lead in sentence to the second paragraph.

*Page C.4-18 (PDF page 409 of 642)*

Section C.4.39.8.5.5 describes what attributes make up “Special Aquatic Sites” but does not make any comments of their presence in the project area, or on the effects of the TSP on those Special Aquatic Sites, which is the heading for that section. To help address this concern, suggest adding a sentence of introduction to the subsequent subsections where a discussion of those effects is provided.

*Page C.4-21 (PDF page 412 of 642)*

Section C.4.39.8.7: Suggest adding “presented in the following subsections” between “evaluations” and “address” in the first sentence.

*Page C.4-38 (PDF page 429 of 642)*

In the Recreation Area response discussion on the top of the page, the discussion is directed to Chapter 258 State Parks and Preserves. However, the County Natural Areas (totaling slightly less than 26,500 acres) in the project area (Loxahatchee Slough, Hungryland Slough, Sweetbay, Pond Cypress, Pine Glades, and Cypress Creek) could be added in the discussion. All of these County sites provide passive recreational activities with a few freshwater fishing facilities. A few include more active recreational activities, such as bicycling, horseback riding, and canoeing/kayaking. Please consider adding them into this discussion.

## Appendix D – Real Estate

*Page D-5 (PDF page 476 of 642)*

Figure D-2: Please include the Pine Glades Natural Area (the southern portions of the western Pal-Mar area) and the Sweetbay Natural Area (northwest of the North County Airport) in yellow as “Other Conservation Land”.

*Page D-10 (PDF page 481 of 642)*

Section D.3.1.5: Sixth sentence is confusing and incomplete, please rewrite for clarification.

Section D.3.2, second sentence in first paragraph: Please identify the natural area east of the North County Airport as the Loxahatchee Slough Natural Area. In addition, please include the Sweetbay Natural Area that is ~1,000 acres west of the North County Airport.

*Page D-12 (PDF page 483 of 642)*

Section D.3.2.1: The second to last sentence in the third paragraph states “...the 250 cfs pump station mentioned in previous paragraphs.” but this is the first time the pump is mentioned. Please correct the wording to be consistent with text.

*Page D-19 (PDF page 490 of 642)*

Section D.4.1: In the second sentence, change “West Palm Beach County” to “the City of West Palm Beach”.

*Page D-20 (PDF page 491 of 642)*

Section D.4.1.4: In the last sentence, change “than” to “then”.

Section D.4.1.5: Change “than” to “then”.

*Page D-22 (PDF page 493 of 642)*

Section D.4.3.2 discusses private ownership along the Cypress Creek Canal where berm improvements may be required. There is no discussion about needing temporary construction easements for those lands and whether if needed, those easements will be needed from the private owners or Martin County. Please clarify.

Section D.4.3.3: Again, there is no discussion about who controls (owns) the canal that bisects the project area nor what needs to be done to control the canal that bisects the project area. That canal is proposed to be removed with construction of the flow-through marsh.

Section D.4.3.5: The last sentence is incomplete; suggest adding the words “will be needed” to the end of the sentence.

Section D.4.3.6: The first sentence needs to show shared title lands between Martin County and SFWMD for the lands in Martin County. Palm Beach County only owns the land in Palm Beach County. Also, in the last sentence, change “than” to “then”.

*Page D-23 (PDF page 494 of 642)*

Table D-3, Flow-way 1 - G-161 row, Current Sponsor Estate column state “Easement”. This is different than the text in Section D.4.3.1 which states SFWMD has fee title to area. Please correct.

*Page D-30 (PDF page 501 of 642)*

Second paragraph from bottom of page: Correct the typo in the word “virtue”.

*Page D-32 (PDF page 502 of 642)*

Second and third paragraph from top of page: Correct the typo in the word “virtue”.

Second paragraph above Section D.18.3: Correct the typo in the word “certain”.

*Page D-34 (PDF page 505 of 642)*

Section D.21 states that the section will be updated after completion of the gross appraisal. Please provide a timeline of this work so the entire planning, design, construction, and implementation process is better understood.

*Page D-39 (PDF page 510 of 642)*

Figure appears to show the RV Motorhome Park on Indiantown Road surrounded by the County’s Cypress Creek Natural Area in yellow. According to the legend, this land is proposed for fee acquisition. Is that correct?

*Page D-40 (PDF page 511 of 642)*

Figure shows all of the County’s Cypress Creek Natural Area as having an easement on the land and includes the RV Motorhome Park property, which is private land with no conservation easement. The legend does not explain the meaning of the diagonal hatching overlain on the various colored properties. Please correct.

*Page D-41 (PDF page 512 of 642)*

Legend again does not explain the diagonal crosshatch overlay. Please remove or explain this diagonal crosshatch. This applies to all the maps on pages D-40 – D-45.

*Page D-42 (PDF page 513 of 642)*

Figure shows Riverbend Park as land to be surplus and disposed. The County would be very upset if those lands are declared surplus and disposed. It is unclear what exactly the maps are intended to show as they are not titled as to their purpose. The reader can only infer their purpose from interpreting the colors and explanation in the keys.

*Page D-43 (PDF page 514 of 642)*

The figure lacks clarity on the status and intent of the old State Road 7 ROW alignment or the old Donald Ross Road ROW alignment. These ROWs have been (Donald Ross Road), or are in the process of being added (State Road 7) to the conservation lands of the County's Loxahatchee Slough Natural Area. Suggest updating this map to reflect current status.

*Page D-45 (PDF page 516 of 642)*

Figure depicts a portion of the Loxahatchee Slough Natural Area immediately south of the North County Airport as proposed for easement acquisition. Acquiring easements over County-owned conservation lands has the potential to trigger the County Conservation Lands Protection Ordinance.

*Page D-46 (PDF page 517 of 642)*

Table is very difficult to read as font size is too small. Please enlarge. In addition, the property control number given for County-owned land (00414205010010000) does not exist in the County property appraiser database; please correct. In addition, an entry shows Walter and Joyce Hatcher as owners. The property control number given is not in the County property appraiser database either. This land, in the southern portion of the Cypress Creek Natural Area, is likely owned by the County. Please update the table.

## Appendix E – Plan Formulation

*Page E-1 (PDF page 531 of 642)*

Section E.1: In the last sentence of the first paragraph, suggest providing details on how “acceptability” decisions were determined. For example, were potentially impacted parties contacted for potential objections? Or was this simply an evaluation conducted by the Corps and/or SFWMD? Please provide more details on how “significant adverse environmental effects” were determined. Was this done by a consensus of biological experts on the PDT? In addition, please provide details on how something was deemed too be “cost prohibitive”? For example, what were the parameters used for this determination, and who made the determination? More detail on how these determinations were made would make review and acceptance of the results in Table E-1 more meaningful.

*Page E-2 (PDF page 532 of 642)*

Table E-1: Please provide details on how “acceptability” was determined.

## Appendix F – Recreation Analysis

*Page Appendix F-5 (PDF page 561 of 642)*

Section F.4.2: In the third sentence of the second paragraph, insert the word “Jaega” before “Wildways” and delete the words “Jesup Trail”. All other references to “Palm Beach County’s Wildways” or just “Wildways” in this Appendix should include the word “Jaega” before “Wildways”.

Section F.4.2: In the third paragraph, suggest inserting a new sentence as the last sentence of the paragraph. It is suggested to read: “For example, the Palm Beach County Cypress Creek Natural Area that is traversed by the Jesup Trail and is immediately west and north of Riverbend Park, provides amenities such as multiple wildlife observation platforms, a freshwater fishing pier, a canoe/kayak launch and a canoe trail.”

*Page Appendix F-10 (PDF page 566 of 642)*

Section F.5.3: While the proposed footbridge might be consistent with the concept of connecting the J.W. Corbett WMA and the OTL with the Loxahatchee NWR along the L-8 Canal, the County contends that the trail connection should be on the west side of the L-8 Canal at this point. The County desires to utilize the existing property on the west side of the L-8 Canal, developed by the County under a Linear Park Permit from the SFWMD from the L-8 tie-back Canal to the southern boundary of the J.W. Corbett WMA. This proposed trail connector has been under development by the County for more than 10 years with extensive restoration. This work on the trail connection was done to be consistent with County development orders for the Palm Beach Aggregates L-8 Reservoir, now owned by SFWMD, that required a right of way for the trail on the west side of the L-8 Canal to be granted to the County. This issue is still unresolved. The County suggests this proposed footbridge be moved to become a bridge across the L-8 Canal at the southern boundary of J.W. Corbett WMA to connect the restored linear parkway trail right of way to the J.W. Corbett WMA. As this bridge would need to be larger and longer than the one proposed, costs would increase accordingly. The County also believes this trail connection to the OTL could be shown to then proceed northwest to Lake Okeechobee and the Lake Okeechobee Scenic Trail (LOST) around the lake. This proposed trail connection is one of the County’s Jaega Wildways trail systems that is, and has been, under development for many years.

*Page Appendix F-14 (PDF page 571 of 642)*

Table F-6, first row, fourth column from left: There is a “3” after the word “activity” but it is unclear if this is a typo to be removed, or if it is to represent a superscript to a missing reference. Similarly, in the third row, first column from left, there is a “5” after the word “capacity”. Finally, in the last row, second column, there is a “7” after the word “quality”. Please either remove or add relevant table notes.

## Appendix G – Benefit Model

*Page Appendix G-25 (PDF page 609 of 642)*

Section G.5.1.2: In the fourth sentence of the first paragraph, delete the word “were” between “5R” and “had”.

*Page G-29 (PDF page 613 of 642)*

Section G.5.1.3: In the second sentence of the first paragraph, it appears the word “life” should be changed to “lift”.

## Appendix H – Climate Change Assessment

### *General comments*

Appendix H is very technical with references to several existing gauges and data interpretation methods, all of which do not tell us much about what will happen with sea level rise, other than some generic statements that saltwater intrusion might increase and that severe events might impact in-river structures. The County is disappointed that the final results of the climate change assessment are not yet available to review.

### *Page H-16 (PDF page 639 of 642)*

Section H.5.1: In the paragraph preceding Table H-2, please correct “Error! Reference source not found.”

### *Page H-17 (PDF page 640 of 642)*

Section H.6: The third paragraph states the full sea level rise analysis is not complete and once complete, it will be provided during the next submittal. Please provide details on when this analysis will be complete and available to review.

### *Page H-18 (PDF page 641 of 642)*

Section H.6: The last paragraph states: “In conclusion, the impacts of climate change on the LRWRP TSP in this DRAFT PIR will require additional study as climate change tools and techniques evolve and become more mature.” This leaves the reader somewhat skeptical as to whether the TSP will function as sea level rise increases.

## Annexes

### Annex A – Fish and Wildlife Coordination Act and Endangered Species Act Compliance

#### *Page 5 of 319*

Suggest adding the word “Report” between “Act” and “(FWCAR)”.

#### *Page 22 of 319*

The FWCAR includes a description of the Loxahatchee Slough as 11,000 acres (the County manages 12,950 acres in the Loxahatchee Slough Natural Area) and bases its description of vegetation communities on data from the SFWMD in 2004. This data is 15 years old and does not reflect the restoration efforts of the SFWMD to restore designed water levels in the Loxahatchee Slough with the replacement of the PC-17 Culverts with the PC-17A and PC-17B culverts, nor the County restoration efforts to improve the quality and extent of the vegetation communities in the Loxahatchee Slough. Please update accordingly.

#### *Page 55 of 319*

Section D: “LOWRP” should read “LRWRP”.

#### *Page 184 of 319*

Table A-1, Loxahatchee Slough row: Again the acreage given for the size of the Loxahatchee Slough is in error. The County manages 12,950 acres in the Loxahatchee Slough Natural Area.

#### *Page 186 of 319*

Figure A-2 should include the Pine Glades Natural Area in Yellow on the map.

*Page 190 of 319*

In the first line of the page, “Error! Reference source not found.” needs to be corrected. The third line on the page has redundant use of 91 percent. The fourth sentence on the page alludes to future cost analysis for the spreader swale in Flow-way 3, however, that cost-benefit ratio has already been completed and reported earlier in Annex A.

*Page 205 of 319*

Section A.5.1.1: In the last line of the first paragraph, “Allapattah Falls” should read “Allapattah Flats”.

*Page 208 of 319*

Section A.5.1.3: It may be appropriate to mention that an experimental planting of the Okeechobee Gourd at the County's East Conservation Natural Area, located immediately east-northeast of the Loxahatchee NWR, is in progress. It is being done in hopes of establishing another viable population of the Okeechobee Gourd in southeast Florida region.

*Pages 318 and 319 of 319*

These pages mention a biological opinion still to be added and that correspondence relative to the ESA is trying to be located and will be added at a later date. Is there any timeline for when this information will be supplied?

## [Annex B - Analyses Required by WRDA 2000 and Florida State Law](#)

*Page Annex B-5*

Section B.3.1: In the third paragraph, correct “Error! Reference source not found.”

*Page Annex B-6*

Table B.1: “Grass Waters” should be “Grassy Waters”.

*Page Annex B-8*

Section B.3.1.1: There is discussion of stage duration curves. In the second to last paragraph of this section in the second to last sentence, it says “Once sorted, the values are ranked from highest to lowest.” It is unclear as to what is meant by sorted, and how is that done? Is the sorting something different than the ranking?

The last paragraph of this section speaks of HEC-RAS modeling that will be added to the final Engineering Appendix to show no negative impacts of flooding to surrounding lands. When will those results be available for review? This information should be provided in the Draft PIR/EIS. Section B.5.2 states HEC-RAS will be done to inform design and operations. Is that the soonest this modeling will be done?

*Page Annex B-12*

Section B.3.3: In the last paragraph, Alternative 5 is mentioned; should this read Alternative 5R. An explanation for this confusion appears in the in Section 6.8 on page 6-40 which is a strange location to find the explanation of the references to Alt 5 and Alt 5R. The last sentence of this section states no difference in the public water supply demand between future without project and the future with project. Is this stated as fact, or is it based on some analysis to reach that conclusion? Was this just an assumption made for the comparison of the alternatives? Please clarify.

*Pages Annex B-14 – B-16*

There are references to Alternative 5. Is it assumed that those readings would be the same for Alternative 5R (the TSP)? If they are, suggest adding a sentence in prior pages stating that fact.

*Page Annex B-16*

Section B.4.1.2: The second paragraph states the FWO had slightly more demand not met of 4,438 MG compared to the 4,417 MG of the TSP. However, Table B-8 on Page B-19 shows 4,438 MG for ECB, not FWO and shows the FWO at 4,419 MG. This is confusing and needs to be corrected.

*Page Annex B-23*

The text describing the SIRWCD and Jupiter Farms stage duration curves states that Figures B-15 and B-16 “show significant changes to groundwater or surface water stages.” However, Figures B-15 and B-16 show no significant changes. Please correct or clarify to avoid confusion.

*Page Annex B-31*

The discussion of Figure B-29 and Table B-9 has a note that the FWO does not have the four components in the TSP so the Flow for FWO is zero. However, Figure B-29 has the FWO in the title of the Figure, but you cannot find it anywhere in the Figure. Please correct or clarify to avoid confusion.

*Page Annex B-33*

Section B.5.3.1: This paragraph talks about reserving water supplies “using the State of Florida’s reservation or allocation authority under state law as presented in Table B-6.” However, Table B-6 shows water demands not met for the various categories in WRA-1 only. Is this table mentioned only as a reference to the categories for which water is needed? If that is the reason, it is not clear how it relates to the State’s authority to reserve allocations and it might be better to refer to the text in the paragraph immediately prior to Table B-5.

*Page Annex B-35*

Section B.6 indicates the Section 373.1501 report is under development and will be added. Please correct to provide reference if included in the Draft PIR/EIS.

## Annex C – Draft Project Operating Manual

*Page Annex C-1*

Section C.1: The reference to Figure 1 should add words “of the PIR” for clarification, otherwise reader is looking for Figure 1 in Annex C. Also, the last sentence has typos and spacing issues, and should read “restoring and/or maintaining oysters, sea grass, and...”

Section C.2: Spell out POM the first time the acronym is used.

*Page Annex C-2*

Section C.2.1: Figure C-1 states it represents existing features, but shows the C-18 West Reservoir and associated pumps proposed in the TSP. Please correct text or figure.

*Page Annex C-3*

The description for Flow-way 2 mentions only the M-O Canal. Suggest adding further description of the west leg of the C-18 Canal as it forms a major portion of that flow-way. Perhaps the last two sentences of the C-18 Canal description on Page C-2 could be used to describe its role in Flow-way 2.

*Page Annex C-4*

Section C.3.3: The last sentence is incomplete.

Section C.3.4: The first sentence has typos with unnecessary underlines on spaces between words. Also, in the third sentence, delete words “do the” between “will” and “support”. Also, a period is needed at the end of last sentence.

*Page Annex C-5*

Section C.3.8 appears to be incorrectly placed in the Flow-way 2 section. This description should be in Flow-way 1 and replace the description given in Section C.3.3.

Sections C.3.9 and C.3.10 appear confusing as to the placement of the flow-through marsh discharge structure. Is the HSLCD canal reroute the same as the marsh discharge point and the Cypress Creek Canal structure? Which is furthest downstream?

*Page Annex C-6*

Section C.3.12: In the first sentence, change “waterleaves” to “water levels”. Also, remove “and” between “flow” and “to”.

*Page Annex C-7*

Section C.5 gives two southern boundaries for the project area. The L-10/L-12 Canal should be the western boundary.

*Page Annex C-8*

Section C.8.2.2: In the last sentence, “LRWWP” should read “LRWRP”.

*Page Annex C-8*

Section C.8.2.3: In the fourth sentence, “item i” likely should be “Section C.8.2.1”.

*Page Annex C-9*

Section C.8.4: In the first sentence, remove “s” between “structure” and “can”.

*Page Annex C-9*

Section C.8.5: In the first sentence, remove underline between “to” and “the”.

*Page Annex C-9*

Section C.8.6: In the first sentence, remove unnecessary underlining.

Section C.8.7: Remove unnecessary underlining.

*Page Annex C-10*

Section C.14: The second sentence refers to a “subparagraph “a” below”, but no such subparagraph is provided. Please correct.

*Page Annex C-12*

Section C.16: The second sentence refers to a “proposed shooting range”. The range is under construction; therefore, suggest deleting the word “proposed”.

*Page Annex C-13*

Section C.19: In the first sentence, change “o” to “to”. Also, the third sentence states “Surface water will be conveyed into the Floridan Aquifer System at a rate of 5 MGD by pumping into the reservoir for subsequent distribution into the C-18 Canal”. This does not make sense, how do you pump into the Floridan Aquifer by pumping into the reservoir? Please clarify.

Section C.23: In the second sentence, delete the word “as” between “conducted” and “to”. Also, a period is needed at the end of the last sentence.

## Annex D – Adaptive Management and Monitoring

*Page Annex D-vi*

Table D-1 has several lines with costs TBD which does not give a very good idea of what the Adaptive Management monitoring and implementation costs might be.

*Page Annex D-9*

Section D.1.2: The last paragraph of the section talks of prioritization of the various uncertainties for the Adaptive Management Plan, but does not state exactly how they were prioritized. Please provide more detail on how uncertainty was incorporated into ranking or prioritization. This issue is also applicable to the far right column of Table D-15 on Page D-68 which speaks to tiers of prioritization.

*Page Annex D-17*

Table D-4: It is unclear how the values shown in the “Model Hydro-period Average Annual Difference” is calculated; please clarify. Also, the color coding does not appear to match the key provided because there are no blue shading in the table. Also, both dark grey and light grey appear in the table, but there is no reference to light grey in the key.

*Page Annex D-21*

In the second sentence of the first paragraph of the “Hydroperiods” subsection, remove the extra “Palm Beach County”.

*Page Annex D-34*

Section D.1.6.3, second paragraph on the page: The last sentence, says: “...resulting in concentrating pools of fish for wading birds at the beginning of the dry season.” For accuracy, suggest changing the word “beginning” to “mid to late phases”.

*Page Annex D-44*

In the last sentence of the first paragraph, change “whether” to “favorable weather”.

*Page Annex D-47*

In the last paragraph on the page, correct “Error! Reference source location not found.”

*Page Annex D-52*

It appears that a 70 percent recover efficiency was assumed for the ASR wells, however, this statement is buried in Annex D. Provide the ASR well recovery efficiency assumption prominently in the main report and provide justifications for the assumption.

*Page Annex D-53*

In the third bullet of subsection “Triggers/thresholds that indicate good LRWRP performance or need for adaptive management action”, please define what parameters meet the term “significantly below”. There is much debate about the efficiency of ASR wells, so this trigger figure for adaptive management is very important.

*Page Annex D-57*

The end of the first paragraph appears to be missing.

*Page Annex D-59*

In the “Pre-Construction Engineering and Design (PED)” subsection, there is an incorrect reference to CEPP’s “blue shanty and seepage management features”. Please correct.

*Page Annex D-60*

Section D.1.12: In the last sentence, suggest adding the words “Refer to the” at the beginning of the sentence to make a complete sentence.

*Page Annex D-63*

In the second sentence, the phrase “as shown in” appears but there is no reference as to where to see the information.

*Page Annex D-83*

Section D.3.6: In the last sentence of section, change “LOWRP”, to “LRWRP”.

*Page Annex D-89*

Section D.4.2: In section D, change “North Fork of Loxahatchee River” to “Northwest Fork of the Loxahatchee River”.

## Annex F – Invasive and Nuisance Species Management Plan

*Page Annex F-21*

Section F.4: There is no mention of local government efforts by the County or the City of West Palm Beach for their efforts to control exotic plants and animals on County-owned land (e.g. Loxahatchee Slough) and the City-owned land (e.g. Grassy Waters Preserve). This section only mentions the Federal and State efforts. Please include these local government efforts, which may be more extensive and thorough than the State or Federal efforts in the Project vicinity.

*Page Annex F-22*

Section F.4.5: Again, there is no acknowledgement of the efforts of local governments to control exotic animal species. The County’s efforts at hog reduction on County-owned natural areas is effective and has been on-going for more than 12 years. Numbers of exotic animals (i.e. hogs) are being kept in check on the natural areas, but surrounding State-managed lands and private properties provide areas where hogs rapidly reproduce and then migrate to the County lands, requiring continual efforts by County contractors to remove the hogs.

*Page Annex F-23*

Section F.6.1: In the last sentence of the first paragraph, correct “Error! Reference source not found.”

*Page Annex F-29*

Section F.6.8.3.3 states “Water being transported via spreader swale must be surveyed prior to and upon installation; to ensure no nonnative or invasive species are propagated throughout the area. The area to which water will be delivered via spreader swale will be hydrologically altered, and must therefore be closely monitored for new invasive and non-native growth.” The County currently maintains the Cypress Creek Natural Area at less than 1 percent aerial coverage by non-native vegetation. The County concurs with the statement in Annex F and expects assurances that if exotic vegetation is introduced to the site from the spreader swale feature, that the Loxahatchee Project will provide the funding to control, or preferably eradicate, the introduced species.

*Page Annex F-30*

Section F.6.8.3.5, fourth sentence: It is not clear if the pump referred to is the one to pump into Gulfstream West, or the pump needed to reroute the water from the Thomas pepper farm at Pratt Whitney Road to the northern HSLCD canal at Pal-Mar west. The description given in Section F.6.8.3.4 does not specifically mention the Thomas Farm pump. Also, please spell out GW (Gulfstream West) the first time used.

Section F.6.9: Suggest adding “species” between “invasive” and “will” in the first sentence.

Section F.6.9.1: There is no mention of actions proposed for the G-160 structure relative to monitoring of management actions to keep aquatic non-native vegetation from spreading downstream. This should be addressed in this section, because the G-160 structure is in Flow-way 1.

*Page Annex F-31*

Section F.6.9.2.2: The first sentence talks about surveys to prioritize non-native and invasive plant and animals in the Hungryland Slough Natural Area. The County would like assurances that the Loxahatchee Project will fund these control efforts in this vicinity. Also, in the third sentence, change the “an” to “and” between “structure” and “appropriate”.

*Page Annex F-32*

Section F.6.8.3.5: Section number is incorrect. Also, it is not clear if the pump referred to is the one to pump into Gulfstream West, or the pump needed to reroute the water from the Thomas pepper farm at Pratt Whitney Road to the northern HSLCD canal at Pal-Mar west.

*Page Annex F-32*

Section F.8: The first sentence is incomplete and “Error! Reference source not found.” appears and needs to be corrected.

*Page Annex F-33*

Table F-9 is broken into two parts with the second part displayed first; please correct. Moreover, this table is shown to be on page F-45 in the Table of contents but appears on page F-33. Please correct duplication of the tables and review the pagination in all tables of contents for all parts of the PIR, appendices, and annexes.

*Pages Annex F-34 – F-42*

Table F-1 lists invasive or non-native plant species in the project area and their ranking by FLEPPC and mentions the source of the information. The County maintains a good database of the plant species, both native and exotic, that occur on County natural areas. Was there any attempt made to incorporate this

data? There may be an additional exotic species recorded that is a FLEPPC category I or II and should be mentioned in this report.

*Page Annex F-43*

Table F-3: Suggest adding Egyptian Goose (*Alopochen aegyptiaca*), which is an exotic goose species that has been seen in the vicinity of the Grassy Waters Preserve and the Solid Waste Authority preserves and could be a potential visitor or invader of the Gulfstream West flow-through marsh.

*Page Annex F-48*

Table F-10: Flow-way 3 Cypress Creek Natural Area row shows "(1480a)" in the label of the row. Is this supposed to be acres as provided in other rows or does it refer to something else? If it is acres, does this refer to the approximately 2,400 acres of natural area lands in both Martin and Palm Beach Counties, or just the Palm Beach County portion? The annual cost for the OTM column appears too low. The County's experience with exotic vegetation removal for the Cypress Creek Natural Area (which currently has less than 1 percent aerial coverage of exotic vegetation) is significantly (>3 times) higher than the \$69,930 listed. An explanation of how the costs were derived would be helpful in assessing these proposed costs and should be included. This comment also applies to for the costs shown in Table F-11 for OMRR&R on Page Annex F-51.

## Attachment 1



County Administration  
P.O. Box 1989  
West Palm Beach, FL 33402-1989  
(561) 355-2030  
FAX: (561) 355-3982  
www.pbcgov.com



Palm Beach County  
Board of County  
Commissioners

Melissa McKinlay, Mayor

Mack Bernard, Vice Mayor

Hal R. Valeche

Paulette Burdick

Dave Kerner

Steven L. Abrams

Mary Lou Berger

County Administrator

Verdenia C. Baker

 *Equal Opportunity  
Affirmative Action Employer*

Official Electronic Letterhead

July 16, 2018

Colonel Jason Kirk  
Army Corps of Engineers, Jacksonville District  
701 San Marco Boulevard  
Jacksonville, FL 32207

Dear Colonel Kirk:

**Subject: Palm Beach County's Support for Continuation of the  
Loxahatchee River Watershed Restoration Project-  
Project Delivery Team**

Palm Beach County has been a leader in regional restoration efforts in the Loxahatchee River watershed, aggressively pursuing land acquisition and wetland creation projects for the benefit of the ecosystem. County staff has also been engaged in every iteration of the Loxahatchee River Watershed Restoration Project (LRWRP) effort co-sponsored by the Army Corps of Engineers (ACOE) and the South Florida Water Management District (SFWMD) through the Comprehensive Everglades Restoration Plan (CERP). We urge the ACOE to continue with this effort and move expeditiously toward identifying a Tentatively Selected Plan (TSP), and finalizing the Project Implementation Report (PIR).

The Loxahatchee River has been a federal priority since 1985, when it was designated as a Wild and Scenic River. Delivering clean freshwater to the River, especially during the dry season, is a lynchpin to successful restoration. The LRWRP must move forward to achieve ecosystem goals in this region, and to fully capitalize on the significant investment of time, money, and staff resources that have been committed thus far. Palm Beach County is greatly invested in this effort. Several county owned natural areas, totaling 27,708 acres and 88% of the acreage of the Natural Areas Program, are all part of the Loxahatchee River watershed and will benefit from the restoration efforts.

Palm Beach County remains steadfastly committed to restoring the Loxahatchee River but it will take a unified commitment at all levels of government to continue the work. We urge the ACOE to continue to be

---

a leader in supporting essential restoration for the nationally recognized Wild and Scenic Loxahatchee River and its watershed.

Sincerely<sub>1</sub>



Verdenia C. Baker  
County Administrator

Cc: Deborah Drum<sub>1</sub> PBC Environmental Resources Management  
Ernie Marks<sub>1</sub> Executive Director<sub>1</sub> SFWMD  
LTC Jennifer Reynolds<sub>1</sub> ACOE  
Ken *Todd*<sub>1</sub> PBC Water Resources Manager

## Attachment 2

July 8, 2015

Blake Guillory  
Executive Director  
South Florida Water Management District  
3301 Gun Club Road  
West Palm Beach, Florida 33416-4680

Re: Loxahatchee River Watershed Restoration

Dear Mr. Guillory:

We the staff of local governments in the affected areas of the Loxahatchee River Watershed Restoration Project ("Project"), including Palm Beach County, City of West Palm Beach, Town of Jupiter, Indian Trail Improvement District (ITID) and the Loxahatchee River Environmental Control District (collectively, "Local Governments"), have participated in study and planning activities for the restoration of the Loxahatchee River and Slough system (one of two nationally designated Florida Wild and Scenic Rivers) for over twenty years. Our Local Governments were involved, prior to and during the Restudy effort and continued to remain involved through the authorization and project planning for the Loxahatchee River and Slough as part of the Comprehensive Everglades Restoration Program ("CERP").

We appreciate the opportunity to participate in the South Florida Water Management District ("District") and U.S. Army Corps of Engineers ("Corps") Project Delivery Team (PDT) for the Loxahatchee River Watershed Restoration Project. However, we are concerned that the Project planning does not include the regional objectives that were so important to our local governments' support of the North Palm Beach County - CERP Project (NPBC Project). The original elements of the NPBC Project sought to restore the Northwest Fork of the Loxahatchee River, reduce damaging fresh water discharges to Lake Worth Lagoon, and restore flows to Grassy Waters Preserve and Loxahatchee Slough, while protecting water supply, water quality and flood protection. These goals remain important to the region and our Local Governments.

We urge the District to include these regional water resource needs in the ongoing planning of the Project. We understand that there are funding and timing limitations on the federal government's participation. However, the overall restoration of the Loxahatchee River and Slough system is dependent upon key regional projects that if not included and funded in this Project will have to be separately addressed and funded by the District, Department of Environmental Protection (DEP) and Local Governments.

Over the years local governments have contributed expertise and financial assistance in planning and implementing features of the NPBC Project, including the pilot testing of the L-8 Reservoir, the purchase and restoration of wetland areas for connectivity, construction of the G-160 and G-161 structures, the ITID Pilot Pump Project, and increasing the capacity of the City of West Palm Beach Control 2 structure. We are concerned that these early commitments and investments by our Local Governments are not being appropriately recognized in the Project planning.

We urge the District in its role as local sponsor of the Project to pursue a balanced planning approach which equally emphasizes restoring the environment, providing for future and existing water supplies and improving stormwater systems as originally provided in the NPBC Project plan. We recommend that the following components be included in the Project planning and alternatives analysis:

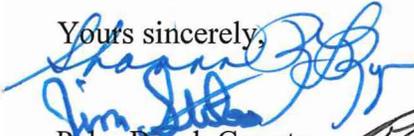
- Reservoir on the Mecca Property for storage of excess water for restoration flows;
- Deep-water reservoir in the L-8 basin for storage of excess water needed for restoration flows (which were to have been supplied by the L-8 reservoir before it was repurposed for Restoration Strategies);
- Utilization of the Moss property to assist in additional storage of excess water in the system for restoration goals;
- Improvements of conveyance features to move water and recharge the surficial aquifer within the region from the L-8 basin through the Mecca Reservoir, Grassy Waters, to the Loxahatchee Slough and the Northwest Fork of the Loxahatchee River;
- Improvements to infrastructure for enhanced delivery of water flows through Grassy Waters to the Northwest Fork of the Loxahatchee River;
- C-17 back pumping facilities to pump excess water to Clear Lake in order to reduce damaging fresh water discharges to the Lake Worth Lagoon; and
- Consideration of the use of additional water storage reservoirs, natural systems and treatment projects in the region for excess water flows, as lands become available for use by the public.

The inclusion of these components in the PDT planning process will strengthen and complement the Project's restoration goals. Each of these components will provide regional benefits in water quality, water storage and restoration flows, supporting the overall Project's goals. A holistic project planning approach decreases the risk of project implementation delays, and the increased costs and inefficiencies of competing plans that may be at cross purposes. These components need to be considered in the alternatives analysis. For those components that may not become part of the selected alternative, the District needs to insist that they still be considered in the planning and design of the chosen alternative in order to ensure that when these critical regional projects are funded and built they will be consistent with and work with what is designed and built for the Loxahatchee River Watershed Restoration Project.

Regardless of the final outcome of the PDT process, we encourage the District to support and prioritize these regional projects and expedite their completion through pursuit of state and federal grants and appropriations, cooperative funding, and active project partnerships with local partners. We also recommend that the District include these critical components as priority water resource development projects in the Lower East Coast Regional Water Supply Plan and other District planning processes which are critical to maintaining public water supplies for future generations. These regional components are also critical to the District to meet its commitments to the Recovery Plan for the Minimum Flow and Level for the Northwest Fork of the Loxahatchee River and for the establishment of a Water Reservation for restoration flows to the Loxahatchee River and Slough system.

As staff of our Local Governments we recognize the importance of actively participating in regional water resource planning and development that considers the balance of ecological restoration, water resource development, water quality criteria, water supply and flood protection. We support the District in its efforts to do the same in our region. We look forward to working with the PDT on a Project plan that can be timely implemented and meet the restoration objectives for the Loxahatchee River and Slough and the larger region affected by Project implementation. As staff to this region's Local Governments we remain committed to working with the District to take the steps necessary to achieve these regional benefits.

Yours sincerely,

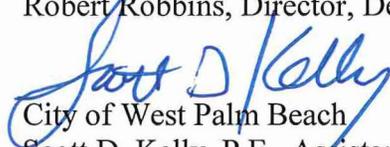
  
Palm Beach County

Shannon LaRocque, P.E., Assistant County Administrator

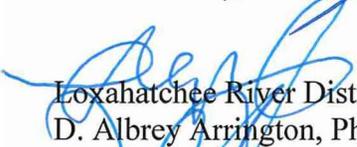
James C. Stiles, Director, Water Utilities

Kenneth S. Todd, Jr., P.E., Water Resources Manager

Robert Robbins, Director, Department of Environmental Resources Management

  
City of West Palm Beach

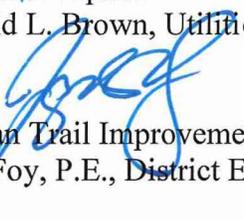
Scott D. Kelly, P.E., Assistant City Administrator

  
Loxahatchee River District

D. Albrey Arrington, Ph.D., Executive Director

  
Town of Jupiter

David L. Brown, Utilities Director

  
Indian Trail Improvement District

Jay Foy, P.E., District Engineer

## Attachment 3

September 15, 2016

Peter Antonacci, Executive Director  
South Florida Water Management District  
3301 Gun Club Road  
West Palm Beach, Florida 33416-4680

Re: Loxahatchee River Watershed Restoration Project

Dear Mr. Antonacci:

The local governments in the affected area of the Loxahatchee River Watershed Restoration Project ("Project"), including Palm Beach County, the City of West Palm Beach, Town of Jupiter, Seacoast Utility Authority, Indian Trail Improvement District and the Loxahatchee River Environmental Control District (collectively, "Parties"), have participated in regional planning activities to address the water resource needs in Northern Palm Beach County for at least twenty years, even prior to the inception of the Comprehensive Everglades Restoration Plan in 2000 ("CERP"). This diverse group of responsible stakeholders recognizes the importance of regional water resource planning that balances ecological and public water supply needs. The Parties appreciate the opportunity to be represented through their participation in the ongoing Project planning efforts as part of the Project Delivery Team (PDT) led by the South Florida Water Management District ("SFWMD") and U.S. Army Corps of Engineers ("Corps"). The Parties urge the District and Corps to include in the selected alternative those broader regional objectives and locally preferred options that support and benefit the Project and that were previously acknowledged during the planning for the 2010 North Palm Beach County- Part 1 CERP Project ("NPBC Project").

The original elements of the NPBC Project included five goals that were designed to be consistent with comprehensive restoration that addressed water resource issues on a regional level. The goals included: 1) restoration of the Northwest Fork of the Loxahatchee River (one of two nationally designated Florida Wild and Scenic Rivers); 2) restoration of the Loxahatchee Slough; 3) the reduction of damaging fresh water discharges to Lake Worth Lagoon by increasing surface water storage and conveyance; 4) restoration of the Grassy Waters Preserve and enhancement of water supplies for local governments in Palm Beach County and; 5) the provision of better flood protection for the western communities within the County. These goals remain important to the region and participating stakeholders, particularly in light of the harmful discharges that have occurred over the past several months. Local governments have contributed time and financial assistance in implementing the NPBC Project plan, including participation in the pilot testing of the L-8 Reservoir, purchase and restoration of wetland areas for connectivity, construction of G-160 and G-161 structures, the ITID Pilot Pump Project, and increasing the capacity of the City of West Palm Beach Control 2 structure. However, the NPBC Project was placed on hold by the Corps in 2010.

When the PDT process was restarted in early 2015 the NPBC Project had been rebranded the Loxahatchee River Watershed Restoration Project and the Corps had revised the goals for the Project. The L-8 Reservoir had been repurposed to provide water deliveries south to the Everglades and was no longer available to provide water for the MFL of the Loxahatchee River. The five goals agreed upon in 2010 by the local participants, the SFWMD, and the Corps were no longer the goals for the Project. Instead, the Corps indicated they would only focus on the first two goals stated above in the new planning effort. The Parties believe that it is in the best interests of the general populace of Palm Beach County and the region to continue to plan for the original five goals. With that in mind, the Parties developed a conceptual "Locally Preferred Option" that has been included in 2 of the 5 alternative plans that are being modeled and studied in detail as part of the development of a Tentatively Selected Plan ("TSP") for the Project.

The Parties believe the Locally Preferred Option offers a more balanced planning approach than any of the other alternative plans to be studied. The Locally Preferred Option equally emphasizes restoring the environment, providing for future and existing water supplies and improving flood control systems while preventing harmful discharges to coastal waters as provided in the original 2010 NPBC Project and the CERP plan. A regional holistic Project planning approach decreases the risk of project implementation delays, increased costs and inefficiencies of competing plans that may be at cross purposes.

As such the Locally Preferred Option includes all of the following features/components:

- Completion of a reservoir on the Mecca Property for storage of excess water for restoration flows;
- Completion of the C-51 Reservoir for deep-water storage within the L-8 basin to replace capacity lost when the L-8 Reservoir was repurposed for Restoration Strategies;
- Utilization of the Moss property to assist in additional storage as part of the system in meeting restoration goals;
- Construction and/or improvements of conveyance features to move water and recharge the surficial aquifer within the region from the L-8 Basin to the Mecca Reservoir, M Canal, to the Loxahatchee Slough, and to the Northwest Fork of the Loxahatchee River;
- Construction of infrastructure required to deliver sufficient water to the M Canal and Clear Lake to compensate the City of West Palm Beach for water that moves north from Grassy Waters (through G-161) to the Northwest Fork of the Loxahatchee River;
- Construction of C-17 back pumping facilities to capture water from the C-17 Canal that otherwise would be lost to tide and thus, decrease the damaging fresh water discharges to the Lake Worth Lagoon.
- Construction of a control structure within the L-8 Canal that prevents flows from Lake Okeechobee with high concentrations of nutrients from entering the Lake Worth Lagoon or Grassy Waters Preserve.

The Parties will continue working through the Project Delivery Team in the hopes of finalizing the selection of a TSP that can be timely implemented and meets the objectives of the Loxahatchee River and the Loxahatchee Slough, as well as the larger region affected by Project implementation. Regardless of the final outcome of the PDT process, the Parties encourage the SFWMD to take the lead on water resource development for the North County area as the regional agency of the state responsible for flood control and water resource protection. The Parties request that SFWMD prioritize the remaining regional objectives to increase storage and conveyance of surface water, provide adequate present and future water supplies, insure protection of water quality and flood protection as well as restoration of the Lake Worth Lagoon and expedite their completion through inclusion of the additional components as priority water resource development projects for the region in the Lower East Water Supply Plan and other District planning processes. The Parties additionally recommend that SFWMD undertake measures to expeditiously implement the additional components including the provision of cooperative funding, pursuit of state and federal grants and appropriations, and active cooperation and project partnerships. The Parties remain committed to partnering with SFWMD and other regional partners to take the steps necessary to achieve the desired regional benefits beyond the PDT efforts stated as the Cmps' goals of the Loxahatchee River Watershed Restoration Project. As part of that partnership, the Parties request that the SFWMD take the lead as the local sponsor for the Locally Preferred Option should it not be selected by the Cotps as the TSP.

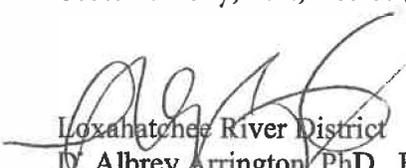
Yours Sincerely,

 Kenneth S. Todd, Jr.

Palm Beach County  
Shannon LaRocque, P.E., Assistant County Administrator  
James C. Stiles, Director, Water Utilities  
Kenneth S. Todd, Jr., P.E., Water Resource Manager  
Robert Robbins, Director, Department of Environmental Resources Management

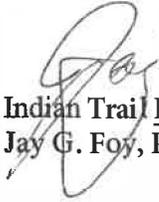


  
(City of West Palm Beach)  
Scott D. Kelly, P.E., Assistant City Administrator

  
Loxahatchee River District  
D. Albrey Arrington, PhD., Executive Director



**Town of Jupiter**  
**David L. Brown, Utilities Director**



**Indian Trail Improvement District**  
**Jay G. Foy, P.E., District Engineer**