



County Administration

P.O. Box 1989
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**Palm Beach County
Board of County
Commissioners**

Dave Kerner, Mayor
Robert S. Weinroth, Vice Mayor
Hal R. Valeche
Gregg K. Weiss
Mary Lou Berger
Melissa McKinlay
Mack Bernard

County Administrator

Verdenia C. Baker

*"An Equal Opportunity
Affirmative Action Employer"*

Official Electronic Letterhead

March 9, 2020

Via Email: LoxRiverComments@usace.army.mil

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

Dear Dr. Hodgson,

**Subject: Palm Beach County Comments on the Final
Integrated Project Implementation Report and
Environmental Impact Statement for the
Loxahatchee River Watershed Restoration Project**

Thank you for the opportunity to comment on this important Comprehensive Everglades Restoration Plan (CERP) project. Palm Beach County (County) supports efforts by the U.S. Army Corps of Engineers (USACE) to restore the Loxahatchee River watershed.

As communicated via the attached letter from County Mayor Dave Kerner dated February 26, 2020, the County recommends that the USACE transmit a Chief of Engineers report for the Loxahatchee River Watershed Restoration Project (Project) to enable authorization by Congress in 2020. The County also formally requests that additional language be added to the Chief of Engineers report that recommends flexibility or allowance for consideration of alternative water storage options to address County and stakeholder concerns with the C-18 West (or Mecca) Reservoir.

For example, the following language could be added to the end of paragraph 2.b. of the draft Chief of Engineers report: "To address stakeholder concerns, alternative water storage options may be implemented provided their cost is less than the above described feature and equal or greater environmental benefits are expected."

The following are detailed comments intended to resolve some minor errors or omissions in the subject report:



Dr. Ann Hodgson
March 9, 2020
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Page 1-6, Table 1-2

In the Loxahatchee Slough row, suggest adding “to less than 1% aerial coverage” to the end of the last sentence after the word “infestations”.

Page 5-12, Table 5-4

Snail kites are present in the Loxahatchee Slough, therefore suggest removing the word “potentially”.

Appendix C, Pages C.3-35 and C.3-91

The responses to County comments refers to an attached figure and graphics, however no figure or graphics are attached.

Appendix C, Page C.3-149

The sentence at the end of the next to last paragraph should read “For example, reducing undesirable discharges into the Lake Worth Lagoon.”

Appendix F, Figure F-4 legend

Change “Seminal” to “Seminole”

The County looks forward to working with USACE on a path forward to implement Loxahatchee River restoration. In addition, the County will continue to advocate that the benefits contained in the original North Palm Beach County Part 1 project approved by Congress in 2000 as part of CERP but were removed from this Project, be implemented as soon as possible. Those benefits include reducing damaging freshwater discharges to the Lake Worth Lagoon and reducing potential flood damages and increasing the availability of water supplies in the County. We also look forward to collaborating with the South Florida Water Management District (SFWMD) to ensure the L-8 Reservoir/Flow Equalization Basin replacement storage feature, which is prerequisite to achieving the objectives of SFWMD’s Restoration Strategies, is implemented in a timely manner.

Sincerely,

Jeremy McBryan, PE, CFM
County Water Resources Manager

Attachment

cc: Patrick Rutter, Assistant County Administrator
Deborah Drum, Director, Environmental Resources Management



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February 26, 2020

Via Email: LoxRiverComments@usace.army.mil

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

Dear Dr. Hodgson,

**Subject: Loxahatchee River Watershed Restoration Project –
Requested Language for the Chief of Engineers
Report**

Palm Beach County (County) supports efforts by the U.S. Army Corps of Engineers (USACE) to restore the Loxahatchee River watershed and recommends that the USACE transmit a Chief of Engineers report for the Loxahatchee River Watershed Restoration Project (Project) to enable authorization by Congress in 2020. In addition, the County is formally requesting that additional language be added to the Chief of Engineers report that recommends flexibility or allowance for consideration of alternative water storage options.

The County has been a leader in restoration efforts in the Loxahatchee River watershed, aggressively acquiring almost 28,000 acres of land and restoring wetlands for the benefit of the ecosystem. County staff has also been engaged in every iteration of Loxahatchee River restoration, including when it was identified as the North Palm Beach County Project.

As you know, there is a lack of stakeholder support for a single element of the Project, the proposed above-ground water storage reservoir on the Mecca site. County and stakeholder concerns with the Mecca reservoir include the 20-foot embankment heights and perceived flood risks and public safety issues, high costs and its incompatibility with adjacent lands, including existing and proposed natural areas. In July 2019, the County, in an effort to address County and stakeholder concerns, initiated a feasibility study to optimize and/or refine the Project alternatives previously evaluated by USACE.



Dr. Hodgson
February 26, 2020
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The County believes that there are other more cost-effective solutions that would provide significant benefits to the Loxahatchee River watershed, increase flood control and water supply benefits, and improve conditions in the Lake Worth Lagoon, all of which would garner broad stakeholder support.

Unfortunately, there does not appear to be an opportunity within the USACE process that allows incorporation of additional information from the County's feasibility study. As such, the County has expressed interest in collaborating with SFWMD to pursue alternative water resources solutions that: 1) address County and stakeholder concerns with the proposed Mecca reservoir; 2) achieve ecosystem restoration goals that are not being addressed by the Project; and 3) are compatible with other SFWMD efforts to achieve state-mandated water quality initiatives within the County.

This letter formally requests that language be included in the USACE Chief of Engineers report for the Project that: 1) recognizes the County's concern with one element of the Project, the Mecca reservoir; and 2) recommends flexibility or allowance for consideration of alternative water storage options to address County and stakeholder concerns with the Mecca reservoir. Also, the County requests that USACE coordinate with the County during future Project-related activities such as the development of project partnership agreements, sequencing plans and design activities.

The County looks forward to continuing to work with USACE and is committed to providing technical, stakeholder coordination and legislative support.

Sincerely,

Dave Kerner
Mayor, Palm Beach County

cc: Members, Palm Beach County Board of County Commissioners
Verdenia C. Baker, County Administrator, Palm Beach County
Patrick Rutter, Assistant County Administrator, Palm Beach County
Jeremy McBryan, Water Resources Manager, Palm Beach County
Members, Palm Beach County Water Resources Task Force
Colonel Andrew Kelly, U.S. Army Corps of Engineers
Lt. Colonel Todd Polk, U.S. Army Corps of Engineers
Drew Bartlett, South Florida Water Management District
Governing Board Members, South Florida Water Management District