



Sustainable
PALM BEACH COUNTY

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

Via email to: LoxRiverComments@usace.army.mil

May 6, 2019

Re: Comments on the Loxahatchee River Watershed Project Draft Project Implementation Report / Environmental Impact Statement

Dear Dr. Hodgson,

The Everglades Law Center and Sustainable Palm Beach County support state and federal efforts to restore the Loxahatchee River watershed and are pleased to submit the following comments on the Loxahatchee River Watershed Project Draft Project Implementation Report / Environmental Impact Statement.

The Loxahatchee River is Florida's first federally designated Wild and Scenic River. The river's watershed spans 260 square miles, and contains a significant acreage of publicly owned lands which are in various stages of restoration. Restoration efforts in Palm Beach County in and around the Loxahatchee Slough have resulted in significant benefits to the river's hydrology. Martin County has similarly engaged in restoration on publicly owned land that has benefitted the river by increasing flow to its tributaries. Within the proposed plan, we are most supportive of opportunities to conduct additional environmental restoration within the river's watershed to restore wetlands and habitats for wildlife, while increasing flow to the river.

Plan Formulation Issues

During Project Delivery Team meetings, stakeholders were assured that after the initial round of alternatives modeling, the individual components would be regrouped and reevaluated to result in one or more alternatives comprised of the most effective and beneficial combination of components. However, at the final PDT meeting in 2018, it was stated that due to time and cost overruns, the Corps would need to seek an additional waiver to complete the plan within the Corps planning process and that as a result, no additional analysis or modeling would be conducted. As a result, the alternatives within the final array fail to contain the most effective and beneficial combination of components. For example, none of the final array of alternatives included both natural storage at Mecca Farms and deep storage at C-51 with the full suite of restoration components within Flowway 3. We urge the Corps to reconsider the decision to stand on the initial array of alternatives and to engage in additional limited modeling to consider an optimized alternative with natural storage on Mecca Farms as described above.

Concerns regarding Reservoir Storage on Mecca Farms

Mecca Farms is uniquely situated, surrounded on three sides by natural lands: the Corbett Wildlife Management Area to the west, the Hungryland Slough to the north, and the soon to be restored wetlands on the Avenir parcel (formerly Vavrus Ranch) to the east. To the south, it borders the residential neighborhood of the Acreage and to the southeast, the future residential development Avenir. Because of its proximity to existing and future natural areas, the Mecca site is ideally situated for wetland restoration / natural storage. For a fraction of the cost of reservoir storage, a reconstructed wetland system on Mecca Farms could be used to flow water from the Corbett Wildlife Management Area to the east through Mecca Farms, and ultimately through the restored wetlands of the Avenir parcel to the east through the County's Sweetbay Preserve into the Loxahatchee Slough and into the River.

As proposed, a reservoir on the Mecca site is incompatible with the surrounding uses. Aesthetically, from surrounding natural lands, the twenty-foot berms of the Mecca reservoir would be visible from great distances and would mar the landscape and diminish the experience of users of those natural areas. Similarly, a deep storage reservoir is unlikely to be looked upon favorably by the residents whose homes are unfortunate enough to be located adjacent to it.

The significant cost of the reservoir also raises concerns about the likelihood of Congress appropriating the funds to move this project forward in an expeditious manner. Natural storage on Mecca Farms and the adjacent Avenir parcel can be constructed for a fraction of the cost while providing similar benefits and should be further evaluated. Excess water exists within the Indian Trails Improvement District that could be routed north to provide additional flows to the River as warranted.

Should the reservoir overcome the hurdles associated with its large price tag and funding and ultimately be constructed on Mecca Farms, the issue of maintenance is also a long-term concern. As the Corps is aware, the Herbert Hoover Dike surrounding Lake Okeechobee has been compromised for at least 2 decades and it was only recently, after the dike was identified as posing the highest level of risk to human safety that funds to expedite the repairs were appropriated. Should the berm around a reservoir on Mecca require repair or maintenance, what assurances can the Corps provide that the funds will be promptly available to expedite the work necessary to ensure the safety of the families whose homes are in proximity?

Another potential threat of deep storage on Mecca Farms is the potential for proliferation of cyanobacteria / blue green algae. There is no water quality treatment component associated with the tentatively selected plan, and as a result, no way to treat the water from a potential reservoir prior to release to the River. Last year when algae was present in Lake Okeechobee, the City of West Palm Beach had to shut off the connection from the Lake to Grassy Waters Preserve which resulted in a reduction of flows to the Loxahatchee River. The significant threats posed by cyanobacteria on human health are just starting to be understood and the potential for cyanobacteria to proliferate in a deep storage reservoir should be fully evaluated before moving forward with this component.

Measurement of Flow / Tributary Contribution

The plan's reliance on the measurement of flow at Lainhart Dam tends to overlook / understate the contribution of water to the River from its other tributaries. The river receives a significant portion of its flow from Cypress Creek and other tributaries, which should be considered in the analysis. Opportunities exist to conduct additional restoration work within the river tributary basins which could increase flows to the river downstream of Lainhart Dam and which would be equally beneficial to the river in terms of meeting its dry season demand and offsetting saltwater intrusion.

Flow way Three / Watershed Restoration Opportunities should be Maximized

Much of the hydrologic improvement that the river has seen in recent years has come from restoration in the river's watershed. The work that Palm Beach County has done with restoration in the Loxahatchee Slough and that Martin County has done in the river's northern watershed have resulted in significant benefits to the river's hydrology. Before moving forward with highly engineered and costly proposals for deep storage on Mecca Farms, all opportunities to expand restoration within the watershed, including the watershed of the river tributaries should be identified and considered.

Aquifer Storage and Recovery

It appears that the recovery assumptions for the proposed Aquifer Storage and Recovery wells may be overly optimistic and the associated water quality treatment component is unclear. Additionally, these wells have high operational and maintenance costs and their effectiveness is highly site specific. We urge the Corps to reconsider this portion of the project in favor of a natural storage flow way component that connects Corbett, Mecca Farms, Avenir to the Loxahatchee Slough.

Sea Level Rise

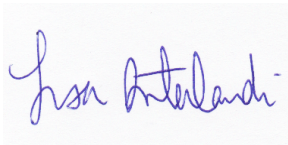
Table 2-1 states that effects of sea level rise were analyzed and are pending, however this analysis was not considered in the evaluation of alternatives. A more meaningful approach would have been to utilize the analysis of effects of climate change and sea level rise to evaluate alternatives, rather than the analysis being conducted solely on the tentatively selected plan. Were that analysis done, it is unlikely that any of the alternatives would be able to provide sufficient flow to offset the impacts of sea level rise within the river. Maximizing the restoration of the natural systems within the river's watershed provides the best approach for the river and its watershed to be able to adapt to future climatic changes.

Land Ownership Maps

Figures 1-3 and 2-2 should depict SFWMD ownership of Mecca Farms.

In conclusion, the Everglades Law Center and Sustainable Palm Beach County are supportive of efforts to restore the Loxahatchee River, particularly the watershed restoration components which we believe should be expanded. We do not support the use of Mecca Farms for a storage reservoir for the reasons stated herein and encourage project planners to conduct additional limited modeling of a restored wetland / flow way system from Corbett through Mecca Farms, through Avenir and east to Loxahatchee Slough. We thank you for your consideration of these comments.

Sincerely,



Lisa Interlandi
Executive Director / Everglades Law Center
Director / Sustainable Palm Beach County