

**INDIAN TRAIL IMPROVEMENT DISTRICT
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Established 1957

www.indiantrail.com

April 29, 2019

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

**RE: Loxahatchee River System Watershed Restoration Project (LRWRP)
NEPA Draft Integrated PIR/EIS
Indian Trail Improvement District (ITID) Comments**

Dear Dr. Hodgson;

We clearly understand this project is limited to the Loxahatchee River and its tributaries. However, we believe commenting on the overall issues is important, but will make these overall comments brief with little explanation due to the purpose of the project:

1. The previous North PBC Plan included benefits to water supply, flood protection, and other environmental areas as well as reductions to freshwater flows to the Lake Worth Lagoon. This project omits these benefits.
2. The long term success of CERP requires an L-8 Plan. No plan presently exists.
3. Palm Beach County was promised replacement storage for the L-8 Reservoir when it was "repurposed" to a Flow Equalization Basin. No replacement presently exists.
4. We prefer an overall solution such as in Alternative 10.

The ITID Board at its 4/17/19 meeting voted to send this letter of concern to you. Our specific issues are:

1. The stages within ITID's M-1 Basin, both Upper and Lower, are controlled by our SFWMD permit conditions. As ITID is limited to 1/4"/day discharge when the regional system is stressed we discharge excess rainfall as quickly as possible to recover storage to be prepared for the next storm in the wet season and may allow some slightly higher stages in the dry season in an attempt to keep some water in our canals for fire protection (most of the M-1 Basin doesn't have a potable water supply) and to keep the groundwater as high as possible for the 18,000 or so residential wells. The model results depict higher water levels than ITID has held or will hold. We therefore are concerned that the water delivered to the River from ITID may be anticipated and modeled to be higher than could occur. We suggest another model run with Alternative SR that corrects these inaccuracies.
2. The Tentatively Selected Plan SR utilizes water from ITID in two locations: at the Mecca Impoundment and into the City of West Palm Beach's "M" Canal. The

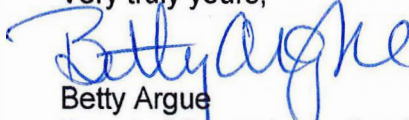
**Indian Trail Improvement District Board of Supervisors
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ITID Board has not agreed to these connections and will need some type of legal agreement(s) for this to come to fruition. We respectfully suggest some institutional contact be initiated to see what would be needed. Please note in the past the Board rejected the connection to the "M" Canal when initiated by the City of West Palm Beach. ITID will need some type of guarantee that the pumps from ITID will be operated by ITID and pumping cannot be initiated by any other entities. We would expect all costs including design, bid letting, construction, operations, and maintenance be paid for by the beneficiaries of the water.

3. The Mecca Impoundment is cited as an above ground impoundment with a levee at about 18.5' above existing ground with a 7200 AcFt capacity. The cited capacity for Alternative SR is 9500 AcFt. We realize the design is not done but question why an entirely above ground impoundment is cited and what the levee height will be if all above ground for the 9500 AcFt impoundment. The concerns here are levee failure and visual for the property owners to the south. We have confidence the Corps will design the levee to the highest safety standards and will offset seepage, but storms can exceed design criteria. Levee failure is not an option.
4. Our last concern is relative to the assumption that 70% of the water injected into the 4 ASR wells will be recovered with the necessary water quality required. We request three alternate model runs using 25%, 50%, and 90% recovery to give insight into the possible risk of ASR and what that means to the flow deliveries to the River.

We appreciate the opportunity to participate in the process as we have since the late 1990's when the plans started to evolve.

Very truly yours,


Betty Argue
Board of Supervisors, President
Indian Trail Improvement District


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

JGF/jgf

Also submitted via email at LoxRiverComments@usace.army.mil

Cc via email: A. Arrington, D. Brown, L. Corry, B. Foster, J. Hager, M. Johnson,
B. Kacvinsky, S. Kelley, S. Lamb, J. Martin, J. McBryan, M. McKinlay,
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