

47 Root Trail
Palm Beach FL 33480

- (1.) The SEIS does not adequately address alternative methods of stabilizing a beach other than traditional nourishment and renourishment. T-groins and offshore breakwaters which will be implemented by Martin, Palm Beach and Dade counties were rejected. The Sloan's Curve ^{Condo} Association just applied to the DER to install 2 T-groins in front of its property to stabilize that beach.
- (2.) Impact to hardbottom reefs are not adequately addressed by this document 3.1 acres of hardbottom will be buried by this project. The EIS undervalues this resource and states that impacts are insignificant.
- (3.) Any scientific studies of the utilization of nearshore hardbottom by juvenile green turtles is completely missing from this document.
- (4.) Most of the scientific literature quoted in the EIS is 20 to 30 years old. Newer scientific studies have been published since the 1990's, but not referenced. Even the weak 1995 "Coast of Florida Study" wasn't mentioned in this document.
- (5.) Impacts to offshore reefs are not addressed, i.e., 2 important north-south reefs are adjacent to the borrow areas. Persistent turbidity plumes around borrow areas could cause acute and chronic stresses to living marine organisms.
- (6.) The hardbottom mitigation proposal is inadequate as the mitigation reef is placed at a different depth than the ephemeral reef and may not be like habitat for marine organisms.
- (7.) The EIS doesn't address cumulative impacts to hardbottom, offshore and nearshore habitats. No post-cumulative studies exist. The EIS repeatedly states impacts are short term and minimal.
- (8.) Ten beach renourishment projects are planned within the vicinity of the Phipps Ocean Park site. The EIS was supposed to focus on cumulative impacts from the Boynton Beach Inlet to the Lake Worth Inlet. This document focuses solely on the Phipps Ocean Park area and minimizes impacts.
- (9.) The EIS does not address cumulative impacts to the borrow site communities. Impacts may be more extensive and long term than suggested (USACOE 1987, 1994, 1996.)
- (10.) The area between County marker R117 and R126 has remained stable or accreted sand since 1974. In fact, there has been concern expressed that placement of sand/nearshore hardbottom may undermine the natural erosion protection that the reefs provide.
- (11) The EIS does not address direct, indirect, nor cumulative impacts to turtle nesting as there is no historic townwide record of nesting behavior.
- (12) Finally, as to sand sources, this document fails to mention the application of the Town for a waiver and variance from Rule CH 62B-41007(J)(2) FAC which will allow it to pump the equivalent of 6,000 truckloads of "rock" upon the Phipps Ocean Park 1.9 mile stretch of beach.

9/10/07 (DISTANCE CASING

PAUL WILSON