



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
4400 PGA BOULEVARD, SUITE 500
PALM BEACH GARDENS, FL 33410

REPLY TO
ATTENTION OF

MAR 22 2010

Palm Beach Gardens Regulatory Section
SAJ-2006-05344 (IP-EGR)

Palm Beach County Board of County Commissioners
Department of Environmental Resources Management
c/o Richard Walesky, Director
2300 North Jog Road, 4th Floor
West Palm Beach, FL 33411-2743

Dear Mr. Walesky:

Reference is made to the application submitted by Palm Beach County requesting federal authorization to construct eleven emergent rubble mound breakwaters approximately 200 feet offshore, between DEP monuments R-61 and R-66. The project is located in the Atlantic Ocean generally between DEP monuments R-61 and R-66, Singer Island, in Palm Beach County, Florida.

In a meeting with your staff on February 16, 2010 in West Palm Beach, it was agreed that the U.S. Army Corps of Engineers (Corps) Jacksonville District would obtain a technical analysis of the proposed project from the Coastal and Hydraulics Laboratory (CHL), U.S. Army Engineer Research and Development Center (ERDC). Specifically, in response to a request from your staff and contract engineers, we agreed that ERDC would provide a review of (1) the modeling and engineering analysis submitted for the proposed project, (2) the potential for downdrift effects resulting from the proposed project, and (3) the existing resources available/state of the art for modeling submerged breakwaters. In a follow-up telephone conference on February 23, 2010, it was further agreed that ERDC would conduct a review of the modeling for the project as proposed due to the discrepancy of opinions among Corps, State, and County engineers.

ERDC has completed its review of the proposed project as detailed in the attached engineering analysis. The ERDC analysis concludes that the proposed emergent breakwaters would present an unacceptable risk in terms of blockage of littoral drift to downdrift beaches and the associated erosional pressure the proposed project will exert on downdrift beaches. Additionally, the Corps, U.S. Fish and Wildlife Service (FWS), and National Marine Fisheries Service (NMFS) have serious concerns about the impacts of the project on threatened and endangered sea turtles.

The Corps anticipates receipt of the NMFS and FWS Biological Opinions for the proposed project on March 31, 2010 unless the project is modified or withdrawn by this date. Therefore, we request that you withdraw the current project and consider other alternatives that would meet the project purpose and have less impact on downdrift beaches and threatened/endangered sea turtles. Please provide a written response to this letter no later than March 26, 2010, with your intentions for the proposed project. If you have any questions concerning this correspondence, please contact Eric Reusch, Project Manager, at the letterhead address, by telephone at 561-472-3529, or by e-mail at Eric.G.Reusch@usace.army.mil.

Sincerely,



Tori White
Chief, Palm Beach Gardens Section

Enclosure

Copies Furnished Electronically:

Palm Beach County Commissioner Karen Marcus
PBC ERM (Daniel Bates, Leanne Welch, Michael Stahl)
NMFS HCD (Jocelyn Karazsia)
NMFS PRD (Robert Hoffman, Dennis Klemm)
FWS (Spencer Simon, Jeff Howe)
FDEP (Merrie Beth Neely)
FWC (Kipp Frolich)
Corps (Tom Martin, Jason Engle)