



WEST PALM BEACH FISHING CLUB

~ Established 1934 ~



July 2, 2019

Ms. Linda Knoeck
U.S. Army Corps of Engineers
4400 PGA Boulevard, Suite 500
Palm Beach Gardens, FL 33410

SUBJECT: Public Notice Response Regarding USACOE File No. SAJ-2019-01046

Dear Ms. Knoeck,

On behalf of the West Palm Beach Fishing Club (WPBFC) I submit the following comments regarding the proposed dock associated with the file number listed above.

The WPBFC has been a strong advocate for Lake Worth Lagoon habitat restoration and protection for decades. Our organization is a frequent partner with Palm Beach County's Department of Environmental Resources Management (DERM) on habitat enhancement projects throughout the lagoon.

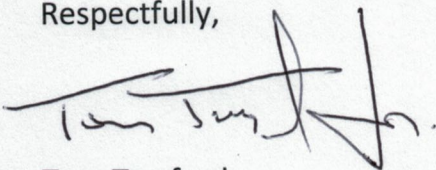
The WPBFC is voicing its concern over the above referenced proposed project for the following reasons:

- The project site is located in one of the most biologically productive and important areas within the Lake Worth Lagoon. Numerous studies and ongoing data collection efforts conducted by the FWC, DERM and others have well established the ecological importance of the Singer Island Cove (area north of Sugar Sands and due east of Little Munyon Island) for critical estuarine habitat, fish and wildlife, including Johnson's sea grass, juvenile green sea turtles and manatees. It is unrealistic to think that the proposed project and any boats/floating homes that will be berthed there would not have a negative impact on these ecologically important resources.

- If approved, the proposed project would set a precedent for owners of adjacent submerged lands to also build similar structures. The cumulative impacts from multiple structures would, in our opinion, have irrevocable consequences to these valuable environmental resources. Why would the USACOE want to set this precedent in such an environmentally sensitive and important area of the Lake Worth Lagoon?
- Significant public dollars have been invested in the Lake Worth Lagoon to restore, enhance and protect estuarine habitat, and help improve water quality. This proposed project, and others that would likely follow, would degrade that public investment.
- We have concerns regarding the draft of the vessels that would utilize the proposed dock. The depth at the project site would only be able to accommodate shallow drafted vessels. It is unreasonable to think there would not be impacts from boat propellers and from the shading of the bottom, reducing sunlight for sea grass growth. Again, the cumulative impacts if other docks are subsequently approved should not be underestimated.

The WPBFC urges the USACOE to deny this permit based upon the impacts it would have on the valuable resources in this portion of the Lake Worth Lagoon, and the precedent it would set for others to develop similar structures in the area. As we have stated in the past (see attached letter to Florida DEP from 2016), we believe all the privately owned submerged lands in the Singer Island Cove should one day be held in the public domain. We are hopeful a fair and equitable resolution between the property owners and governmental agencies can be brokered so that this environmentally critical portion of the Lake Worth Lagoon is protected in perpetuity.

Respectfully,



Tom Twyford
President

Cc: Pete Schulz, WPBFC Chairman

Jason Andreotta, FDEP Director, Southeast District Office

Deborah Drum, Director PBCERM

Commissioner Hal R. Valeche, Palm Beach County Commission, District 1

Dr. Julia A. Botel, Council member City of Riviera Beach, District 4