



HIGGINS ENGINEERING, INC.

Via e-mail: loxrivercomments@usace.army.mil

April 24, 2019

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

Re: Loxahatchee River Watershed Restoration Project Comments

Dear Ms. Hodgson:

On behalf of the Board of Supervisors for the Hobe Saint Lucie Conservancy District (HSLCD), we are providing you with the following comments from the draft Integrated Project Implementation Report/Environmental Impact Statement for the Loxahatchee River Watershed Restoration Project. This Project will affect lands located within HSLCD and as such, it is our duty to protect interests of the land owners within the District. The primary area within HSLCD affected by this Plan is referred to as Ninegem. Preliminary comments on the Plan are as follows:

1. Flooding of the Ninegem properties will impact private lands held east of Seminole Pratt Whitney Road adjacent to Ninegem. These impacts need to be addressed. There is also a parcel of land owned by HSLCD within Ninegem that needs to be addressed and for which compensation is required.
2. The Ninegem South Boundary Canal is a Right of Way owned by HSLCD. Thus, impacts will occur, and compensation to HSLCD will be required.
3. Modification of the Ninegem North Boundary Canal and adjoining Berm will require a permit from HSLCD for this work. Analysis of potential impacts to downstream land owners (primarily Unit 2), will be required, and any impacts mitigated for.
4. The North/South Canals within the Ninegem are covered with HSLCD easements. Impacts will occur and compensation to HSLCD will be required. Impacts to the District's entire drainage system need to be reviewed, including the backbone of the system.
5. A modification of the Water Control Plan that covers Ninegem will be required. All expenses for the amended Water Control Plan, as well as all permits, shall be borne by the ACOE. The proposed pump station for Thomas Produce is located at the upstream end of the site. The Thomas Produce Parcel slopes north downward to the south.

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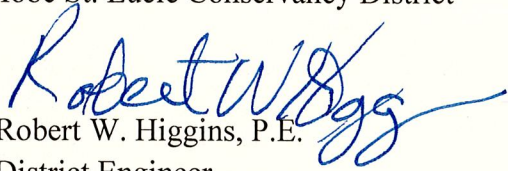
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6. Modification of the Ninegem North Boundary Canal and adjoining Berm will require a permit from HSLCD for this work. An analysis of potential impacts to downstream land owners (primarily in Unit 2) needs to be determined and addressed.

ACOE will be responsible for expenses for this project. We appreciate this opportunity to provide you with these comments. We look forward to working with you as the Plan develops. If you have any questions, please feel free to give me a call at (561) 439-7807.

Very Truly Yours,
Hobe St. Lucie Conservancy District


Robert W. Higgins, P.E.
District Engineer

RWH/ts

07-18

cc: HSLCD Board Members

Pete Pimentel, District Manager

Mary Viator, Esq., District Attorney

Beth Kavinsky, SFWMD