



Mr. Dale Beter
Phipps SEIS Project Manager
U.S. Army Corps of Engineers, Regulatory Branch
400 North Congress Avenue, Suite 130
West Palm Beach, Florida 33401

24 September 2002

Dear Mr. Beter:

Marine Resources Inc. (MRI) was asked by The Citizens Association of Palm Beach to independently review the Supplement Environmental Impact Statement for the Phipps Ocean Park Beach Restoration Project (SEIS). MRI's contractual obligations to the aforementioned association were firmly contingent on the proposed Phipps Ocean Park Beach Restoration Project being evaluated as environmentally sound following our review and subsequent assessment of project environmental components.

MRI is a marine environmental consulting firm located in Stuart, Florida. Our staff has over 50 years experience in the marine consulting industry with the lion's share of our work focusing on Florida marine habitats. MRI was established by experienced professionals to provide scientific expertise, field operational support, and marine survey services associated with environmental and engineering projects. Professional and educational backgrounds include marine biology, ocean engineering, coastal zone management, biological and geotechnical sampling, oceanography, hydrography, and underwater still and video photography.

MRI focused our review on the environmental components of the project and has accepted the statement of purpose and consequential engineering components as stated in the SEIS. The choice of one of the three evaluated alternative courses of action, as preferred by the applicant, is based on meeting stated project objectives. The SEIS identifies and considers the unavoidable and possible environmental impacts that would be the result of conducting the preferred alternative. The unavoidable environmental impact of consequence and stated primary issue of public concern is the inundation of nearshore hard bottom substrate and associated biotic community by beach nourishment sand. This is the only hard bottom habitat that will be impacted if nourishment operations are conscientiously conducted and monitored (e.g., turbidity - as stated in the SEIS).

The nearshore hard bottom substrate exposed along the proposed project area is a common feature of the Florida east coast from St. Augustine to Boca Raton and is not unique. This hard bottom substrate is not a coral reef but rock of the Anastasia Formation comprised of varying proportions of coquina (intertidal bivalves), limestone (calcium carbonate), sandstones, quartz sands, and shell debris. The Anastasia Formation bedrock is reported to have a thickness of 230 ft near the shore in Palm Beach County and is a permanent geologic feature. Under conditions existing prior to construction of the Lake Worth Inlet, surficial exposure of Anastasia rock in the form of nearshore hard bottom was ephemeral, fluctuating between being exposed and covered by a shifting sand veneer.

Marine Resources Inc.
7897 Jack James Dr., Suite A
Stuart, Florida 34997
Phone (772) 221-2181 Fax (772) 221-7715

Lois Edwards

From: "Beter, Dale E SAJ" <Dale.E.Beter@saj02.usace.army.mil>
To: <BgrahamMRI@aol.com>
Cc: <ledwards@coastaltechcorp.com>; "Beter, Dale E SAJ"
Sent: Friday, September 27, 2002 2:32 PM
Subject: RE: Phipps Park SEIS
Bruce:

Your message has been received, placed in the file, and is being forwarded to the applicant's agent to be included with other comments, which will be addressed in the FEIS.

Lois:

Please include these with the other comments received for this project

thanks,

dale

-----Original Message-----

From: BgrahamMRI@aol.com [mailto:BgrahamMRI@aol.com]
Sent: Friday, September 27, 2002 2:17 PM
To: Beter, Dale E
Cc: barnesn@palmbeachcivic.org
Subject: Phipps Park SEIS

Mr. Beter

Please find attached a letter of comment concerning the Phipps Ocean Park Beach Restoration Project. Please submit our letter for incorporation into the SEIS.

Best Regards,

Bruce Graham

Senior Scientist/Vice President

Marine Resources Inc.

10/3/02

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