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10 September 2002

Mr. Ned Barnes, President
Palm Beach Civic Association
The Paramount Building
139 North County Road, Suite 33
Palm Beach, FL 33480

Re: Phipps Ocean Park Beach Restoration Project – Draft SEIS Review

Dear Mr. Barnes,

The Woods Hole Group, Inc. has reviewed the Draft Supplemental Environmental Impact Statement (Draft SEIS) for the proposed Phipps Ocean Park Beach Restoration Project. Our review focused primarily on the environmental consequences of the project. We are qualified to review this document based on nearly 20 years of experience with beach replenishment projects on Florida's Atlantic Coast, including work during the past 5 years with the Town of Palm Beach and its citizens. We consulted to the Shore Protection Board in 1997 to help guide the development of shore protection strategies, and peer-reviewed the Comprehensive Coastal Management Plan that was updated in 1998. The WHG review team for the present review included:

- George R. Hampson - Thirty year employee of the Woods Hole Oceanographic Institution's Department of Biology, a world-known specialist in benthic organisms.
- Robert P. Hamilton Jr. Coastal Engineer with a decade of experience in Florida and other U.S. coastal areas.
- David G. Aubrey, Ph.D. - Former Senior Scientist at the Woods Hole Oceanographic Institution (1978 to 2000; presently an Adjunct Scientist); Specialist in Coastal Processes and Coastal Environments; presently, Chairman of the Woods Hole Group.

We reviewed the Draft SEIS, discussed it internally, and prepared this summary response.

Key Components of Review

Overall, we commend the applicant for a well-written and complete document, and we concur with the information presented in the Draft SEIS. We support implementation of the Phipps Ocean Park Beach Restoration Project.

Based on our familiarity with the Palm Beaches from our previous work there, we recognize that Reach 7 is critically eroded and there is a requirement for beach restoration there. We concur with the Draft SEIS that the primary potential environmental impacts are associated with disruption of the benthic communities at the borrow site and beach replenishment areas, as well as disruption of the nearshore hardbottom resources resulting from offshore dredging, on-shore disposal of dredged material, and related water column turbidity. Dredging and disposal impacts are both short-term construction related and long-term, whereas water quality impacts are only short-term. These types of potential impacts are associated with any beach replenishment project; therefore, the challenge is to minimize impacts to the extent practicable, and then to monitor and mitigate unavoidable impacts. We believe impacts have been minimized and an appropriate monitoring and mitigation plan has been proposed. We also commend the applicant for the extensive environmental commitments associated with this project that are listed in Section 4.27.

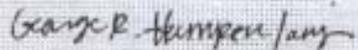
Summary of Recommendations

Our overall recommendation, based on our knowledge of the Palm Beaches and review of the Draft SEIS, is to proceed with the Phipps Ocean Park Beach Restoration Project. We believe the environmental analysis is complete, potential impacts have been minimized, and that appropriate monitoring and mitigation measures have been proposed.

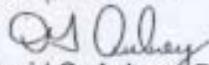
We appreciate the opportunity to continue our participation in the Town of Palm Beach's shore protection efforts. We also would welcome the chance to provide further scientific and engineering input on this project, as well as the overall Palm Beach shoreline management plan. Please contact us with any questions or requirements for additional information.

Sincerely,

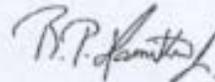
The Woods Hole Group, Inc.



George R. Hampson
Marine Biologist



David G. Aubrey Ph.D.
Chairman and CEO



Robert P. Hamilton Jr.
V.P., Scientific Operations
Coastal Engineer