

TREASURE COAST REGIONAL PLANNING COUNCIL

MEMORANDUM

To: Council Members

AGENDA ITEM 8Q

From: Staff

Date: March 20, 2015 Council Meeting

Subject: Intergovernmental Coordination and Review Log

The Intergovernmental Coordination and Review process serves, in part, as an early warning system for the federal government to determine if a federally funded project is consistent with plans and ongoing community initiatives of local governments and the regional planning council. The review process is intended to inform the applicant of potential concerns or inconsistencies regarding the proposed activity. Council has requested comments from potentially affected local governments in an effort to avoid duplication of efforts, funding, services, and to ensure the efficient use of resources.

The attached Intergovernmental Coordination and Review Log presents three applications for federal funding of projects or programs. The Review Log contains the applicant's name, project location, project description, federal funding source, and the amount of funds requested, as well as designation of Notification of Intent if it is a preliminary application. Staff recommendations are provided on the consistency of funding applications with the *Strategic Regional Policy Plan*.

TCRPC Number	Project Description	Applicant	Funding Agency	Federal Funding Requested	Total Funding
15-PB-02-01	Annual Action Plan 2014-2015	Town of Jupiter	U.S. Department of Housing and Urban Development	\$257,057	\$257,057
15-FL-02-02	Loxahatchee River Watershed Restoration Project	U.S. Army Corps of Engineers	None	N/A	N/A
15-PB-02-03	Draft Environmental Assessment – Compressed Natural Gas Project – Port of Palm Beach	U.S. Department of Energy	None	N/A	N/A
Total				\$257,057	\$257,057

Recommendation

Council should approve the comments in the attached report and authorize their distribution.

Attachments

**TREASURE COAST REGIONAL PLANNING COUNCIL
INTERGOVERNMENTAL COORDINATION AND REVIEW LOG**

TCRPC Number: 15-PB-02-01

Applicant: Town of Jupiter

Project Description: Annual Action Plan 2014-2015

The consolidated action plan serves as an application for funding from the U.S. Department of Housing and Urban Development under the Community Development Block Grant (CDBG) program. The Town of Jupiter is required to submit a consolidated plan every five years that describes how the Town will pursue the overall goals of their community planning, development and housing programs.

The action plan for 2014-2015 describes the programs the Town will carry out during the next year that will primarily benefit the low- to moderate-income residents of the Town. The plan covers the period beginning October 1, 2014 through September 30, 2015. Projects and activities expected to be undertaken using CDBG funds include:

Pine Gardens South Park Improvements: This project is being undertaken to improve park and recreational facilities by renovating Pine Gardens South Park by replacing aging park equipment and improving safety and accessibility. Estimated funding for this activity is \$123,646.

Code Compliance: Code compliance will perform routine inspections of low income neighborhoods, subsequent follow-up inspections, and disseminate information about the Town's housing programs and other programs that may benefit residents. Estimated funding for this activity is \$52,000.

Senior Transportation: This project will improve transportation services by providing free rides to elderly persons who register to participate in the senior transportation program. The Town intends to contract with providers to offer transportation for senior residents to medical appointments and community activities within the Town. Estimated funding for this activity is \$30,000.

Administration: This activity includes general, fiscal, and planning administration expenses incurred by the Town and its consultants in performing, planning, coordinating, and monitoring the CDBG program. Estimated funding for this activity is \$51,411.

Funding Agency: U.S. Department of Housing and Urban Development

Estimated Funding: \$257,057

Recommendations: The proposal is consistent with the **Strategic Regional Policy Plan**. It furthers **Regional Goal 8.1**, public facilities which provide a high quality of life; and **Regional Goal 7.2**, adequate mobility for the transportation disadvantaged.

Agencies Contacted: Palm Beach County
Palm Beach Metropolitan Planning Organization
Town of Juno Beach
Town of Jupiter Inlet Colony
City of Palm Beach Gardens
Village of Tequesta

**TREASURE COAST REGIONAL PLANNING COUNCIL
INTERGOVERNMENTAL COORDINATION AND REVIEW LOG**

TCRPC Number: 15-FL-02-02 SAI# FL201501137150

Applicant: U.S. Army Corps of Engineers

Project Description: Loxahatchee River Watershed Restoration Project – National Environmental Policy Act Scoping Letter

In 2000, the U.S. Congress authorized the Federal government, in partnership with the State of Florida, to embark upon a long-term Comprehensive Everglades Restoration Plan (CERP) to further protect and restore the remaining Everglades ecosystem and provide for other water-related needs of the region. CERP involves modification of the existing network of drainage canals and levees that make up the Central and Southern Florida Flood Control Project.

Currently, the U.S. Army Corps of Engineers, Jacksonville District, is preparing a National Environmental Policy Act assessment for the Loxahatchee River Watershed Restoration Project (LRWRP). The LRWRP, originally entitled the *North Palm Beach County Part 1 Project*, included six individual project components outlined in CERP. During the course of the previous study effort, several of the original project components were eliminated or repurposed. These changes have resulted in the need to reexamine project objectives and identify additional alternatives to achieve restoration within the Loxahatchee River Watershed, River, and Estuary.

The new purpose of LRWRP is to restore and sustain the overall quantity, quality, timing, and distribution of freshwaters to the federally designated National Wild and Scenic Northwest Fork of the Loxahatchee River. This project seeks to restore, sustain, and reconnect the area's wetlands and watersheds that form the historic headwaters for the river and include the areas of: Jonathan Dickinson State Park; Pal Mar East/Cypress Creek; Dupuis Wildlife and Environmental Management Areas; Grassy Waters Preserve; the Loxahatchee Slough, the last remaining riverine cypress stands in Southeast Florida in the Loxahatchee River Floodplain; and the Loxahatchee River Estuary (see attached Project Study Area Map).

The LRWRP will address these goals by developing a series of alternatives that will capture, store, and redistribute water currently lost to tide; rehydrate natural areas that have been hydraulically impacted by excessive draining, water diversions, and structural features, such as, roadways; reduce discharges to the project's estuarine systems; improve

timing and distribution of water for the upstream watershed to increase the resiliency of freshwater riverine habitats to future sea-level changes; and reestablish connections among natural areas. Additionally, improvements to water supply and flood damage risk reduction may occur as a result of the LRWRP.

Funding Agency: None

Estimated Funding: N/A

Recommendations: In 1999, at the request of Palm Beach County and the U.S. Environmental Protection Agency, Council prepared the *Loxahatchee River Basin Watershed Planning Project for Palm Beach County*. This report, which can be found on Council's website, contains twenty-two conclusions and recommendations that discuss a broad range of issues related to the restoration of the Loxahatchee River. This report, and a similar report prepared by Martin County for the Martin County portion of the Loxahatchee River watershed, contain historic information that may be relevant to the proposed project.

The proposed project is consistent with the **Strategic Regional Policy Plan**. The Loxahatchee River Watershed Restoration Project has the potential to help achieve ecosystem restoration, increased water supplies, improved water quality, and the maintenance of flood protection. This project represents an opportunity to accomplish these goals and balance the need to provide water for natural systems and urban and agricultural uses.

Agencies Contacted: Town of Cloud Lake
Town of Glen Ridge
Town of Haverhill
Town of Juno Beach
Town of Jupiter
Town of Jupiter Inlet Colony
Town of Jupiter Island
Town of Lake Park
Town of Loxahatchee Groves
Town of Mangonia Park
Village of North Palm Beach
Martin County
Palm Beach County
Town of Palm Beach
City of Palm Beach Gardens
Town of Palm Beach Shores
City of Riviera Beach
Village of Royal Palm Beach

Village of Tequesta
Wellington
City of West Palm Beach
Jupiter Inlet District
Florida Inland Navigational District

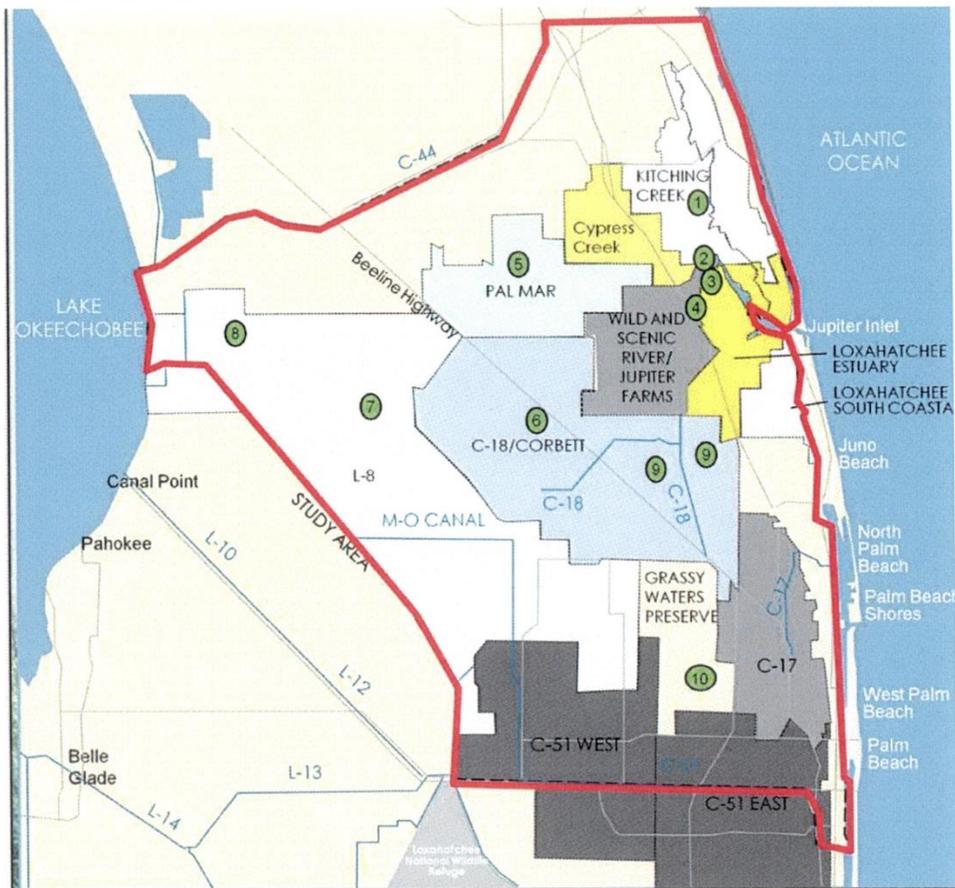


Figure 1. Loxahatchee River Watershed Restoration Project Study Area Map and Natural Areas, Basins, and Water Management Features.

Loxahatchee National Wild and Scenic River Features

1. Kitching Creek
2. Moonshine Creek
3. Cypress Creek
4. Lainhart Dam

Loxahatchee River Watershed Natural Areas

5. Pal Mar Wildlife Management Area
6. Hungryland Slough
7. J.W. Corbett Wildlife Management Area
8. Dupuis Management Area
9. Loxahatchee Slough
10. Grassy Waters Preserve

**TREASURE COAST REGIONAL PLANNING COUNCIL
INTERGOVERNMENTAL COORDINATION AND REVIEW LOG**

TCRPC Number: 15-PB-02-03 SAI#: FL201502137190C

Applicant: U.S. Department of Energy

Project Description: Draft Environmental Assessment – Compressed Natural Gas Project
Port of Palm Beach

Emera CNG, LLC has filed an application with the Department of Energy (DOE) seeking long-term authorization to export compressed natural gas (CNG). Emera is proposing to construct a facility at the Port of Palm Beach for the purpose of compressing and exporting up to 9.125 billion standard cubic feet of CNG per year. Emera’s CNG plant would include facilities to receive, dehydrate, and compress gas to fill pressure vessels with an open International Organization for Standardization container frame mounted on trailers. Emera plans to truck the trailers a distance of one quarter mile from its proposed facility at the port to a berth, where the trailers would be loaded onto an ocean going carrier.

Emera plans to receive natural gas at its planned compression facility from the Riviera Lateral, a pipeline owned and operated by Peninsula Pipeline Company. Emera intends to send the CNG tank containers from Florida to Freeport, Grand Bahama Island. In Freeport, the trailers would be unloaded from the ship and the CNG would be decompressed and injected into a pipeline for transport to electric generation plants owned and operated by Grand Bahama Power Company.

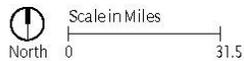
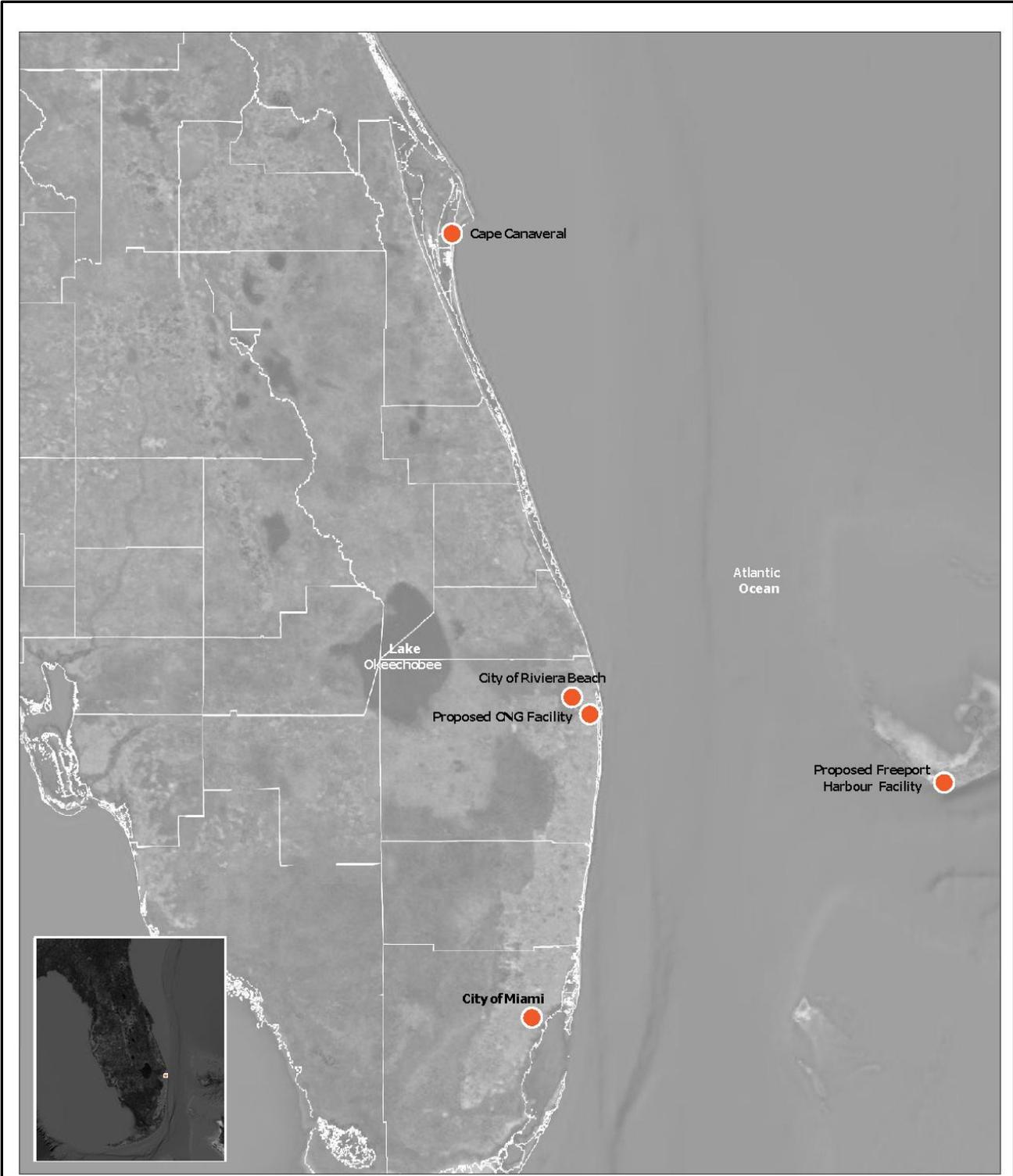
The U.S. Department of Energy (DOE) has prepared a draft environmental assessment (EA) to evaluate the potential environmental impacts of the proposed project. The DOE prepared the EA in accordance with the National Environmental Policy Act. The EA concluded that no significant impacts are anticipated as a result of the proposed project. The Emera project site is currently paved; therefore no impacts to natural resources are anticipated. Minor adverse impacts could occur to some resource areas, such as air quality, during construction; however these would be temporary and would be minimized through use of best management practices during construction. Minor adverse impacts during operations would also be minimized through use of best management practices. Minor beneficial impacts to socioeconomics and environmental justice could result from implementation of the Emera proposed project.

Funding Agency: None

Estimated Funding: N/A

Recommendations: No adverse effects on regional resources or facilities and no extrajurisdictional impacts have been identified.

Agencies Contacted: Palm Beach County
Town of Lake Park
Town of Mangonia Park
Town of Palm Beach
Town of Palm Beach Shores
City of Palm Beach Gardens
City of Riviera Beach
City of West Palm Beach



Compressed Natural Gas (CNG) Environmental Assessment (EA)
Figure 2.1 | Port of Palm Beach Regional Location Map



Source: Esri, DigitalGlobe, GeoEye, Earthstar (USA), USGS, AeroGRID, IGN, IGP, swisstopo, and the GIS User Community



Compressed Natural Gas (CNG) Environmental Assessment (EA)
Figure 2.2 | Proposed CNG Facility to Vessel Delivery Route



CITY OF RIVIERA BEACH

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March 12, 2015

Sent via Email and U.S. Mail:

sheidt@tcrpc.org

fred.pozzuto@netl.doe.gov

Treasure Coast Regional Planning Council
ATTN: Stephanie Heidt, Intergovernmental Coordinator
421 SW Camden Avenue
Stuart, Florida 34994

U.S. Department of Energy
National Energy Technology Laboratory
ATTN: Fred Pozzuto, NEPA Compliance Officer
3610 Collins Ferry Road
P.O. Box 880 Morgantown, WV 26507-0880

RE: Draft Environmental Assessment, Emera CNG, LLC, Compressed Natural Gas Project,
Port of Palm Beach, Florida (DOE/EA-1976D)

Dear Ms. Heidt and Mr. Pozzuto:

Thank you for this opportunity to review and provide comments on the abovementioned Draft Environmental Assessment (hereinafter EA). Administrative Staff of the City of Riviera Beach (hereinafter City) received a copy of the "Notice of Availability" containing a link to this EA regarding the compressed natural gas (hereinafter CNG) proposal set forth by Emera CNG, LLC (hereinafter Emera) from the Treasure Coast Regional Planning Council via email on February 16, 2015; (the EA is a 113 page pdf document, dated February 2015). According to EA Appendix 'A', "Distribution List", Administrative Staff from the Port of Palm Beach (hereinafter POPB) were provided a copy of the EA directly, while the only entity from the City included on the Distribution List was the City's Public Library. Since the POPB exists within the City's municipal boundaries and falls within the City's jurisdiction, we request that the City be added to the distribution list on future correspondence as follows:

ATTN: Ruth C. Jones, City Manager

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600 West Blue Heron Blvd.
Riviera Beach, FL 33404
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Email Address: rjones@rivierabch.com

The City also requests clarification on the project title assigned to this EA; “Emera CNG, LLC, Compressed Natural Gas Project, Port of Palm Beach, Florida”. This title suggests that the POPB is not associated with the City or Palm Beach County (hereinafter PBC). Additionally, this title is not geographically specific, being that the POPB falls within the jurisdiction of the City. Furthermore, the EA “Cover Sheet” (pages i and ii) as well as the EA “Summary” (pages 1 through 7) fail to mention that this project proposal is within the City of Riviera Beach or Palm Beach County. The EA “Introduction” section first mentions “Riviera Beach” on page 8, which appears to be too far into the document. The aforementioned items may cause City residents and/or stakeholders to misinterpret the location of the project proposal, resulting in the preclusion of comments that would otherwise be generated. The City believes that the “City of Riviera Beach” and “Palm Beach County” should appear within the project title and within the body of the report early and often in order to promote clarity and transparency. Additionally, a second draft EA could be released containing these revisions along with an additional public comment period to ensure adequate time for comments.

Also, within the “Availability” section of the EA’s Coversheet, it is stated that a “notice of availability was placed in the South Florida Sun-Sentinel on February 13, 2015, to announce the beginning of the 30-day public review and comment period”. City Staff has concerns that the regional distribution of the South Florida Sun-Sentinel publication (based out of Fort Lauderdale, FL, approximately 50 miles from the City in Broward County) does not adequately cover PBC and in turn, the City’s residents and stakeholders. Other regional newspapers are available, including but not limited to the Palm Beach Post. We believe that this item should be advertised again within a publication customarily having regional distribution within PBC.

In addition to the previously stated items, City Staff has generated the following comments and concerns after review of the EA:

1. The proposed volume of natural gas to be compressed is enormous (9.125 billion standard cubic feet per annum, up to 8 million standard cubic feet per day, with the capability of expanding to load up to 25 million standard cubic feet per day). In a worst case scenario, what is the estimated blast radius if an explosion were to occur? Our calculations indicate that it would be devastating. Our estimation is without factoring in the potential for additional interactions with other adjacent uses and combustible materials.
2. Has a reduced volume of CNG been considered? Why is the proposed amount necessary?

3. What agency would be responsible for ensuring that no more than 9.125 billion standard cubic feet per annum would be shipped from this location? Who is responsible for regulating the total amount of CNG stored on-site and what is the maximum amount allowed?
4. The proposed 9.125 billion standard cubic feet per annum is designated as the “initial phase”. What future phases have been proposed and what approvals would be needed to expand this use if approved? If the currently proposed operation was approved and was successful, it would be logical that Emera would look to expand the distribution range to outside of the Bahamas and increase total production in order to accommodate demand. As provided, Emera has requested approval to export natural gas to countries both with and without free trade agreements (FTA countries and non-FTA countries).
5. This proposal would result in new local environmental impacts; increased ship traffic and associated pollutants emitted from these ships.
6. Emera’s proposal is to supplement or replace one form of non-renewable fossil fuel with another (crude oil with natural gas) lacks long term sustainability. Emera would have the alternative to the proposed action of focusing on renewable power generation in the Bahamas through solar and/wind production, thus avoiding the potential for negative local impacts. As presented, the proposal has little to no benefit to the City of Riviera Beach, yet, the City would have to assume a significant amount of environmental risk and potential costs.
7. According to page 2 of the EA report, it is intended to evaluate “16 resource areas for potential impacts associated with the proposed project. After preliminary evaluation, DOE determined that there would be either no or negligible impacts for eight resource areas: aesthetics and visual resources; land use; community services; cultural resources; geology, topography, and soils; terrestrial resources; noise and vibration; and transportation. Therefore, these eight resource areas were not evaluated in detail in the EA and were not given further consideration”. In reality, there were nine resource areas that were deemed to have no or negligible impacts as the “Utilities” category was not indicated; the EA summary should be revised accordingly.

The City has significant concerns associated with the scope and magnitude of this proposal associated with the following resource areas:

Aesthetics and Visual Resources: On page 11, it is stated that “Port use in Palm Beach predates much of the surrounding residential development along Lake Worth shorelines and the Port educates adjacent communities on the importance of the commerce and the role of the port in the community in an effort to better integrate itself with adjacent areas as it continues to maintain and expand operations”. Port activities that predated residential uses were smaller in scale and had little to no potential to negatively impact the health, safety and welfare of the residents in the area, especially in comparison to the use currently proposed. There seems to be little to no educational material provided or educational process occurring currently. Additional cargo ships that would be required to ship CNG according to this proposal would have a visual impact on the area.

Land use: This proposal would have to adhere to the POPB's Master Plan, PBC's Comprehensive Plan, and the City's Comprehensive Plan, Code of Ordinances and Land Development Regulations. There is little to no discussion of these requirements within the EA. On page 12, it is stated that this project "is proposed to occur in areas zoned industrial within which compressing natural gas is typically a permitted use". Please provide documentation supporting this statement.

Community services: This proposal would impact the ability of City staff to maintain the current level of service we provide to residents and stakeholders. The City's first responders (Police, Fire/EMS) would be expected to serve and coordinate on public safety plans, evacuation strategies and potential implementation. The City may also be responsible for perpetual site inspections. Devoting time to this proposed project would be detrimental to City staff and their ability to serve the existing population. It is stated on page 12 that "the demand would not exceed available capacity of existing services". How was that determined without consulting with the agencies responsible for providing these services?

Noise and vibration: Anticipated decibel levels associated with this operation are not provided. Anticipated hours of operation are not provided. It is stated on page 13 that "...noise and vibration generated as a result of the operation of the proposed facility would be similar to other activities at the ports". This is not adequate to determine anticipated decibel levels from operations.

Transportation: An integral part of this proposal relies on shipping containers full of CNG being trucked onto an ocean-going carrier for transportation. The proposed shipping route would pass by residential and publicly accessible recreational areas. What would the potential blast radius be if a catastrophe occurred prior to a full ship leaving the Palm Beach Inlet? The proposal also requests transportation of CNG to and from other locations as desired by the applicant. Environmental impacts from this could be tremendous in a worst case scenario.

Utilities: Existing utilities are present on site, however, there is no discussion or analysis of potential interactions between the existing FPL Riviera Beach Energy Center and the proposed CNG facility in the event of a catastrophe.

8. According to page 2 of the EA, "the EA discusses the results of the analysis of seven resource areas: water resources, aquatic resources, air quality, solid and hazardous waste, socioeconomics, public and occupational health and safety, and environmental justice. For these resource areas, DOE determined that there would be no impacts or that potential impacts would be minor, temporary or both". The City disagrees with the information provided as it lacks the depth of analysis necessary to adequately describe and compute the risks associated with this proposal.

Individual concerns have been provided below for each resource area:

Water resources: Please provide copies of the POPB's Section 10 and Section 404 permits or include them as supplementary information to the EA or future EIS. The statement is made that "Emera would consult with the Port of Palm Beach and the Florida Department of Environmental Protection (FDEP) to ensure both the project and the Port are in full compliance with local, state, and federal requirements". Please provide documentation supporting that Emera and the Port have guaranteed that the project and the Port will be in full compliance with local requirements. Contaminated water estimated to be generated will be approximately 730 gallons per year. This projection would increase if the use expands. What amount of contaminated water must be generated to classify this as more than just a minor impact? How will the proposed amendments to the regional flood maps impact this proposal? It is stated on page 3 that "no known contamination is present in the groundwater or soils at the project site"; will testing of soil and water be required? One could make the argument that the location meets the EPA definition for a brownfield. What impact would this proposal have on regional water resources in a worst case scenario if there was an explosion?

Aquatic resources: What impact would this proposal have on aquatic resources, including threatened or endangered species in a worst case scenario explosion? It is stated that impacts from this proposed project on "threatened and endangered seagrass, manatees and turtles would be anticipated to be minor as a result of project operations". Although stated as "minor" this proposal would create additional impacts to aquatic resources and to ecologically unique habitat that would not occur if a No-Action Alternative occurred. Additional daily cargo ships would also increase the likelihood of conflicts with objects in and around the Palm Beach Inlet and the POPB. Cargo ships would also produce more water pollution locally.

Air quality: Additional cargo ships would produce more air pollution locally. Trucks within the POPB would produce additional emissions. What impacts are possible due to natural gas leaking or being vented into the atmosphere? If dust might escape into the atmosphere associated with construction activities, would testing of the soils be required to ensure that they are free of contaminants?

Solid and hazardous waste: If soil is disturbed or relocated, would it be tested for potential contaminants since one could make the argument that the location meets the EPA definition for a brownfield?

Socioeconomics: Very few jobs are anticipated to be created during the construction phase and operation phases of this project; less than 10. It is stated that "it is likely that construction jobs would be filled by local or regional construction companies" and that, "the operations stage would result in a small increase in new jobs, likely to be filled from the local population". How is "local"

and “regional” defined? What facts were used to generate and support this statement? Inversely, what is the socioeconomic impact of the proposed use on local property values, public services and public safety; especially in a catastrophe scenario?

Public and occupational health and safety: Significant impacts are provided within the EA on page 6. Specifically, medical emergencies, work-related accidents, potential for chemical releases to affect the facility or port workers or the surrounding public, fires or explosions, technological incidents and terrorist activities. The POPB and Emera have little to no emergency response capabilities and would rely on local and regional assistance for police, fire and EMS services. This is an undue local and City burden that has not been contemplated within the EA as the impacted agencies themselves are not identified within the EA. The EA also states that “the greatest potential safety hazard is a fire or explosion related to a leak or rupture at the facility or within the compressed tanks during shipping”. What is the anticipated evacuation radius or blast zone associated with this proposal; it remains unidentified. Also, the City believes that the connection and disconnection process associated with the filling of tanks prior to shipping presents a risk for mechanical failures or human error, which is not discussed within the EA. The complexity of examining this item seems to exceed the scope of an EA and would require an Environmental Impact Statement, or that the No-Action Alternative would have to be accepted. Page 7 of the EA states that “the construction and operation of the Emera facility would represent a minimum increase in risk to the nearby businesses and communities. With implementation of these best management practices and standard operating procedures, the presence of hazardous materials on the project site would have minor impacts associated with implementation of the proposed action”. This statement is of little comfort to the local citizens that would be forced to live within the proximity of this proposed facility. What statistical analysis has been performed to back the statement above? What facilities or what similar operation can this proposal be compared to? This proposal increases the risk of negative impacts to the health, safety and welfare of the residents of the City, while offering little to no benefit. One would assume that no individual would voluntarily chose to reside next to a facility of this nature, which directly relates to environmental justice concerns.

Environmental justice: (see No. 9 below).

9. Environmental justice has been a concern in the City for decades. Our residents have historically faced a significantly higher amount of detrimental uses than neighboring areas. The 2013 U.S. Census estimate states that the City’s population is predominately Black or African American at 67.47% of the total population. Within PBC, the population is only 17.03% Black or African American. Additionally, the City’s 2013 estimated poverty level is 26.76% while PBC’s is 14.54%. This warrants further analysis and consideration as it appears

that Emera's proposal would not be consistent with the public interest and would have disproportionately adverse impacts on the City's population. This proposal seems to have the potential to significantly benefit other entities involved, but not the City or our residents.

10. On page 7 of the EA, a "Cumulative Impacts" section exists, however it was not expanded upon. There is an absolute need to understand how this proposal would interact with adjacent uses. Also, are there any anticipated impacts associated with the potential for additional phases of this project?
11. This proposal could have a negative impact on property values as fewer individuals would desire to live within close proximity of this proposed use. It may also discourage future investment and development in all areas that may fall within the currently undetermined blast zone. This contradicts the City's desire for redevelopment and growth, especially considering that a majority of the single family neighborhood located to the west of the proposed site falls within the Riviera Beach Community Redevelopment Agency overlay.
12. Figure 2.1, indicates that the proposal is outside of the City's jurisdiction as well as not showing neighboring municipalities (West Palm Beach, Palm Beach, Palm Beach Shores). Figure 2.2 and 2.10 attempts to illustrate the boundary of the POPB, however is it not accurately drawn and requires revision. Also Figure 2.2 is lacking the jurisdictional boundaries of neighboring municipalities.

It is the opinion of the City, that this or any other EA could not adequately analyze and synthesize the multitude of unique and potentially hazardous aspects of this proposal which would cause significant adverse impacts to the environment and community. The fact that the POPB currently handles and stores numerous materials that have the potential to be extremely hazardous individually, illustrates the need to further contemplate how these materials and substances would interact in the event of a worst case scenario explosion. Also, the City has not been able to locate an identical (or similar) project to compare the proposal set forth by Emera. Without a similar project to establish a baseline for analysis, an EA is not configured in the proper manner to allow for the necessary in-depth analysis required for this proposed project. The No-Action Alternative would result in no increased threat to the local environment or population, including adjacent residents and neighboring schools.

Please feel free to contact my office or the Department of Community Development at (561)845-4060.

Sincerely,



Ruth C. Jones
City Manager

C: Danny D. Jones, Deputy City Manager
Troy Perry, Assistant to the City Manager
Clarence D. Williams, Chief of Police
Michael Madden, Assistant Chief of Police
Natalie Moore, Code Enforcement Administrator
Reginald Duren, Chief of Fire
Mary McKinney, Director of Community Development
Jeff Gagnon, Planning and Zoning Administrator
Lucinda Johnson-Monroe, Executive Assistant