



September 21, 2024

Mr. William Lange  
Environmental Manager, Southeast District  
Florida Department of Environmental Protection  
3301 Gun Club Road, MSC 7210-1  
West Palm Beach, FL, 33406

Subject: Aqua Ra (River Watch POA) Dredging; DFEP App. #56-017-3825-005-EI  
U.S. Army Corps Permit Application # SAJ-2023-00574

Dear Mr. Lange:

The Loxa-Lucie Headwaters Initiative is a consortium of non-profit conservation organizations whose mission is to acquire, protect and preserve areas situated between the Loxahatchee River and the South Fork of the St. Lucie River. Our work involves acquiring properties from willing sellers, and performing ecological restoration on those properties through the removal of invasive pest plants and hydrological improvements. One of the land conservation tools at our disposal is the acquisition of property rights through the purchase of conservation easements.

Our Steering Committee has become aware of an application for an Environmental Resource Permit that would allow the dredging in a tidal tributary on the eastern side of the Indian River Lagoon at a location just north of the Martin/St. Lucie County line.

It is our understanding that the area that is proposed to be dredged is within an area that is currently protected pursuant to an existing conservation easement, and that conducting the proposed dredging would require some modification, amendment or exception to the provisions of the site-specific Conservation Easement. Our coalition has raised over \$3M in private donations for land conservation, and many of those donors have made contributions to the cause with the understanding that properties that are subject to permanent conservation easements will be subject to those restrictions on a permanent basis.

The Steering Committee for the Loxa-Lucie Headwaters Initiative objects to any amendment, alteration or revocation of the conservation easement that currently restricts activities on the Aqua Ra/River Watch site.

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In addition to the performing works that are prohibited by the existing conservation easement, we are concerned about the potential direct and indirect adverse ecological impacts that are likely to occur as a result of the dredging. Direct impacts are likely due to the proximity of the dredging area to seagrasses and limited space for ingress, egress and to manage dredged materials. Secondary impacts are likely to occur once the channel is deepened to the extent that motorized vessels have increased access to the tidal basin which appears likely to be Essential Fish Habitat and provide habitat for manatees.

Because dredging in the existing tidal channel is reportedly prohibited by the terms of conservation easement, our consortium opposes the issuance of the requested permit, and we urge the Department, the FDEP Aquatic Preserve Office, St. Lucie County, the Florida Fish and Wildlife Conservation Commission and the U.S. Fish and Wildlife Service to keep the existing protective covenants and Conservation Easement intact.

Thank you for your consideration. If you have any questions or would like to discuss our position, please feel free to reach out to me at [gbraun@loxalucieheadwaters.org](mailto:gbraun@loxalucieheadwaters.org) or (561)-758-3417.

Sincerely,

D. Greg Braun

*D. Greg Braun*

Chair, Loxa-Lucie Headwaters Initiative Steering Committee

cc: C. Dzadovsky, St. Lucie County  
T. Fridrich, Save the Manatee Club  
A. Griffin, St. Lucie County  
S. Heard, Martin County  
J. Tracey, FDEP  
A. LaVere, FWC  
USFWS, Vero Beach  
J. Zahnder, U.S. Army Corps of Engineers

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