



County Administration

P.O. Box 1989
West Palm Beach, FL 33402-1989
(561) 355-2030
FAX: (561) 355-3982
www.pbcgov.com



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March 9, 2021

Via Email: ASRWells@sfwmd.gov

Jennifer Reynolds
Division Director, Ecosystem Restoration and Capital Projects
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, Florida 33406

Dear Ms. Reynolds,

**Subject: Palm Beach County Comments on the Final Draft
2021 Aquifer Storage and Recovery Science Plan
published February 5, 2021**

Excess freshwater during the wet season and inadequate freshwater during the dry season along with excess nutrients in surface water bodies is a widespread, complex, multi-dimensional problem that requires focused investment and regional-scale and local-scale water storage infrastructure and water quality treatment strategies. The Comprehensive Everglades Restoration Plan (CERP) is the roadmap to addressing these issues. However, the pace of CERP implementation has been disappointingly slow, with many projects delayed indefinitely or re-formulated with reduced scopes.

Palm Beach County (County) supports the objectives of the Aquifer Storage and Recovery (ASR) Science Plan, which are to address technical uncertainties of large-scale ASR implementation by conducting studies as ASR wells are implemented in a phased manner. Ideally, the proposed Science Plan can be conducted in a way that will not impede momentum or cause undue delays in implementing much needed water storage projects in the Lake Okeechobee watershed.

Recent discussion has focused on achieving many of CERP's goals simply by modifying Lake Okeechobee operations and water levels. However, Lake Okeechobee operations that drastically lower Lake Okeechobee water levels, without additional water storage features such as ASR wells or above-ground reservoirs in place, has the potential to negatively affect public water supply utilities, businesses and communities throughout Palm Beach County.



Ms. Jennifer Reynolds
March 9, 2021
Page 2 of 2

As such, the County supports the goals of the Lake Okeechobee Watershed Restoration Project (LOWRP), which are to improve the quantity, timing and distribution of water entering Lake Okeechobee, provide for better management of Lake Okeechobee water levels, reduce large freshwater releases to the Caloosahatchee and St. Lucie estuaries, improve system-wide operational flexibility, and restore portions of the historic Kissimmee River and floodplain.

The County also supports state and federal efforts to implement regional-scale and local-scale water storage projects in Lake Okeechobee tributary basins, including ASR wells, consistent with and/or compatible with CERP, prior to implementation of the LOWRP.

In addition, four (4) ASR wells are proposed to be located within Palm Beach County and are a critical component of the Loxahatchee River Watershed Restoration Project (LRWRP), which was authorized by Congress as part of the Water Resources Development Act of 2020 and signed into law by the President in December 2020. The objectives of the LRWRP rely heavily on optimistic ASR well performance projections, especially during dry times when little to no surface water is anticipated to be available within the proposed above-ground Mecca reservoir. As such, the County strongly encourages construction and testing of ASR wells at the Mecca site as soon as possible to assist in determining actual ASR well performance at this location and assessing its viability as a future component of the LRWRP.

Sincerely,

Jeremy McBryan, PE, CFM
County Water Resources Manager

cc: Robert T. Verrastro, South Florida Water Management District
Beth Kacvinsky, South Florida Water Management District
Tim Gysan, U.S. Army Corps of Engineers
Eva Velez, U.S. Army Corps of Engineers
June Mirecki, U.S. Army Corps of Engineers
Patrick Rutter, Assistant County Administrator, Palm Beach County
Deb Drum, Environmental Resources Management Department
Director, Palm Beach County