



St. Johns County Board of County Commissioners

Utility Department

PUBLIC COMMENT ON DRAFT INTEGRATED WATER RESOURCE PLAN (IWRP) SUBMITTED 31 JULY 2015

The SJCUD summarized the following comments from a technical memorandum submitted by Jim Gross on behalf of Matanzas RiverKeeper, South Anastasia Community Association, Friends of Matanzas, and the Florida Wildlife Federation. [Click here for complete technical memorandum.](#)

Comment M1: It would be prudent for St. Johns County to assess the risk salinity might have in altering the natural ecosystem and adversely impacting native varieties of sea grass in the Matanzas River. This assessment should be done before committing to any options that would significantly increase the discharge of dissolved solids into the Matanzas River.

Response M1: The SJCUD meets the requirements of Permit Number FL0038831 for the Anastasia Island WWTF, which includes monitoring dictated by the State. The salinity is tested quarterly and included on the Discharge Monitoring Reports. The salinity was 1,400 mg/L last quarter. There is no limit on the salinity coming from the WWTP effluent discharge; however, average sea water salinity is approximately 35,000 mg/L.

Comment M2: There are uncertainties and risks concerning the feasibility of aquifer storage and recovery. These risks should be addressed through preliminary feasibility work before the County commits to the larger expenses of permitting, well construction, and testing. Given that there have been public concerns in Florida about the safety and environmental risks associated with aquifer storage and recovery projects, it would be prudent for this feasibility work to be as open and transparent as possible.

Response M2: If the SJCUD decides to evaluate aquifer storage and recovery as a long-term solution, extensive research and feasibility studies will be conducted. The Board of County Commissioners' meetings are open to the public, and projects in our capital improvement program would need approval to move forward. The SJCUD also maintains a distribution list for communicating with stakeholders and works with the regulatory agencies daily.

Comment M3: The recommended plan does not include SAV3 and SAV5 options, which are the most progressive conservation measures identified in the IWRP. It would be informative to St. Johns County to see how these options might lessen the need for increased water supplies in the future. It would be worthwhile to run a few additional scenarios with the SAV3 and SAV5 options, but modified to show no direct costs to the County for these options.

Response M3: SAV2 and SAV4 were included in the recommended plan as cost-effective conservation programs. SAV3 and SAV5 are not cost-effective options and therefore not

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included in the recommended plan. The County can look into alternative funding sources to implement some of the ideas suggested by these options.

Comment M4: St. Johns County should look at approaches to slow down the saltwater intrusion problem with its groundwater supplies from the Floridan aquifer. An option would be wellfield management, which might include rotating wells, shallower wells, and/or more wells.

Response M4: The County completed a wellfield optimization study this year to outline a management plan and address concerns related to groundwater quality.

Comment M5: It would be prudent for the County to collaborate with other water users within the County as it refines, updates, and implements its water supply plan.

Response M5: The County continues to have a proactive approach to integrated water resource management. Open lines of communication with the agricultural industry and other utilities within the County are in place to facilitate coordination.