

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
10/17/2018	Ed Fielding, Martin County	CCMP Revision: IRLNEP Responds to a Changing Lagoon (Page 8 and 9)	I believe our mission is to work toward restoration. TMDLs are not sufficient as they allow polluters to continue to pollute. Companies, users, impose economic cost on others and avoid cost that they should assume. As long as people can avoid paying the cost of what they are doing they will continue to do it. That may be allowing polluted waters to be discharged from a water treatment plant, continue to rid themselves of biosolids created at a waste treatment plant via land spreading, chemically kill vegetation in waterways which then becomes ammonia, muck and chemical breakdown of the herbicide, etc. If true costs are not levied then egregious acts will continue.	Noted - TMDLs are only a small portion of the CCMP
10/17/2018	Ed Fielding, Martin County	IRLNEP: Core Values (Page 10)	Financing of IRL restoration is not responsibility of IRL NEP; however we can support via education of citizens and local government leaders, grant projects and research leading to restoration.	Agree - this is why funding is part of the adopted goals
10/17/2018	Ed Fielding, Martin County	Role of the IRLNEP (Page 15)	Map ecological assets – “scared spots” acknowledged by native Americans, fish breeding locations, need to be protected as species do not readily relocate when disturbed.	Noted - this can be considered during mapping
10/17/2018	Ed Fielding, Martin County	Role of the IRLNEP (Page 15)	Monitoring plan several organizations are involved; Orca, Harbor Branch, MRC, FOS, UF, etc. IRL might be a conduit to make groups aware of where others are monitoring and what they are doing.	Agree - the IRLNEP will coordinate with these organizations during development of the Monitoring Plan
10/17/2018	Ed Fielding, Martin County	Impaired Waters (Page 18)	TMDL – if our mission is restoration of the Lagoon, we are not likely to achieve that goal if we continue to allow polluters to continue to pollute. People should pay their own true cost or stop doing whatever is being imposed on others.	Noted
10/17/2018	Ed Fielding, Martin County	Impaired Waters (Page 18)	Barriers – project ideas; what if we seek source of contamination, determining how to stop or begin to minimize; there are a multitude of ideas	Noted - this is part of the Strategies
10/17/2018	Ed Fielding, Martin County	Wastewater (Page 21)	Reclaimed Water (gray water) must be sufficiently treated so we are not just adding pollutants to the waterways under the guise of conservation.	Noted - projects to improve reclaimed water will be included in the Projects Plan
10/17/2018	Ed Fielding, Martin County	Wastewater (Page 22)	OSTDS inspections; legislative request to become pilot program for septic inspection prior to sale of property.	Noted

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
10/17/2018	Ed Fielding, Martin County	Wastewater (Page 22)	Reclaim water (gray water) pollutant loading to be monitored at plant and not allowed to exceed ?, so we are not just putting more pollutant back into waterways.	Noted - projects to improve reclaimed water will be included in the Projects Plan
10/17/2018	Ed Fielding, Martin County	Wastewater (Page 22)	Biosolid applicants to provide monitoring reports at outfall points of the property.	This idea can be discussed
10/17/2018	Ed Fielding, Martin County	Wastewater (Page 23)	Martin County has an Extension Program Mission, Objective and Criteria now being implemented to transfer sewer service from septic to waste water treatment plant; previously shared with Brevard. Send under separate cover.	Thank you for the information
10/17/2018	Ed Fielding, Martin County	Wastewater (Page 24)	Short term goals, everyone to design the necessary improvements so their WWTPs meet the AWT standards or better. Actually all need to be better if we wish to attain restoration of IRL.	Moving towards AWT is part of the planned outcomes for the WWTPs
10/17/2018	Ed Fielding, Martin County	Stormwater (Page 25)	Water Quality – need to redirect water to the west and into St. Johns	See discussion in Connected Waters and Watersheds
10/17/2018	Ed Fielding, Martin County	Stormwater (Page 26)	Retention/detention – developed property discharge cannot exceed predevelopment as to volume nor quantity, but maintain quality; must provide on-site retention and detention. As measured by 3 day rainfall of 100 yr event.	Noted
10/17/2018	Ed Fielding, Martin County	Stormwater (Page 26)	Maintenance – convert from herbicide control of vegetation in waterways to another system, perhaps physical extraction then algal conversion to energy program	Added to list of suggested maintenance practices
10/17/2018	Ed Fielding, Martin County	Legacy Loads and Healthy Sediments (Page 32)	Stop spraying vegetation with glyphosate which results in breakdown of chemical into phosphorus; causes organic vegetation to become ammonia, and muck	The list of strategies includes harvesting vegetation, instead of spraying it
10/17/2018	Ed Fielding, Martin County	Atmospheric Deposition (Page 36)	High atmospheric deposition of TN & TP in Mosquito Lagoon in need of confirming data.	This table was deleted
10/17/2018	Ed Fielding, Martin County	Contaminants of Emerging Concern (Page 39)	Impact on near shore reef system by flood transported glyphosate, the entire reef is infected and dying.	Noted
10/17/2018	Ed Fielding, Martin County	Seagrasses (Page 42)	Need seagrass nursery projects	This is discussed in the Issue Summary

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
10/17/2018	Ed Fielding, Martin County	Living Shorelines (Page 50)	Encourage Counties to change Land Development Regulations (LDR) and Comprehensive Growth Management Plans to reflect strong preference for natural shorelines over hardened	This is included in Living Shorelines-5
10/17/2018	Ed Fielding, Martin County	Wetlands and Impounded and Altered Marshes (Page 52)	Mosquito impoundments, if on private property, work with appropriate local governmental body to reach out to property owner to reconnect waters	Added to list of Strategies
10/17/2018	Ed Fielding, Martin County	Spoil Islands (Page 56)	More closely evaluate sea level rise impact; minimize capital investment in spoil islands; request help from coalition of 4 southern counties to better understand sea level rise.	Noted
10/17/2018	Ed Fielding, Martin County	Land Conservation (Page 58)	Redirect water flows west and into St. Johns as we will need the fresh water	See discussion in Connected Waters and Watersheds
10/17/2018	Ed Fielding, Martin County	Connected Waters and Watersheds (Page 63)	Asked Mark Perry to up-date 2018 Everglades Restoration	Additional information was added to the Everglades Restoration section
10/17/2018	Ed Fielding, Martin County	Connected Waters and Watersheds (Page 64)	St. Lucie Inlet man made	This correction was made
10/17/2018	Ed Fielding, Martin County	Biodiversity (Page 67)	Land crabs in Jupiter area, sufficient to stop traffic as late as 1980's, now almost extinct	Noted
10/17/2018	Ed Fielding, Martin County	Biodiversity (Page 68)	Grant Gilmore expert on IRL species, would merit grant support to assemble his research	Potential to address Biodiversity-2
10/22/2018	Bing Ouyang, HBOI	Monitoring and Data Sharing (Page 100)	It is clear that a more robust monitoring strategy will be required. Such monitoring framework will need to be nimble, adaptive. Such framework will also need to have the ability to integrate the sensor data from different sensors. In fact, machine-learning based sensor fusion will be one of the most critical force multiplier to enable an effective monitoring solution. In this regard, the HBOI's Hybrid Aerial/Underwater RobotiC System (HAUCS) framework, -- a four-year 1.2 million projected funded via NSF National Robotics Initiative (NRI) program can be leveraged to build the foundation of such framework.	Noted - this can be considered in implementing Monitoring-4

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
10/22/2018	Bing Ouyang, HBOI	Living Shorelines (Page 48) and Commercial and Recreational Fisheries (Page 77)	An area that has not been adequately addressed is rapid coastal construction deployment during an emergency, and resource (i.e., power, space) efficient and flexible shoreline protection. This will require the study of new materials and to develop novel resource (energy, space) efficient “smart” shoreline protection structures using such materials. In this regard, the concept of Smart Underwater Self-sustained Expandable Structures (SUSES) that leverages the results from the current ONR-funded project of studying underwater inflatable structure at HBOI may lead to a transformative solution in this regard.	Noted - this option can be included in the Projects Plan
10/24/2018	Jason Brown, Indian River County	Overall	It appears that the Florida Department of Transportation (FDOT) does not have a representative on the IRL Council Management Board from either District 4 or District 5. FDOT is a major player for discharge into the IRL and should be part of the program. We suggest that this be brought to the attention of the IRL Council Board of Directors for discussion.	IRLNEP has talked with FDOT about participation but FDOT is not interested in being a member
10/24/2018	Jason Brown, Indian River County	Overall	FDOT should also have a representative on the STEMAC as well.	IRLNEP has talked with FDOT about participation but FDOT is not interested in being a member
10/24/2018	Jason Brown, Indian River County	Overall	The IRLNEP does not provide parameters for measurements of pollutant loads, testing for existing conditions, or any type real time data collection for any of the targets within each of the five Vital Sign Categories identified in the plan.	Additional details will be developed as part of the Monitoring Plan
10/24/2018	Jason Brown, Indian River County	Overall	The IRLNEP identifies action plans. County Staff recommends the CCMP articulate the types of grant programs and funding available for IRLNEP sponsored projects or programs.	Suggested funding sources are listed in each of the action plan output tables
10/24/2018	Jason Brown, Indian River County	Overall	The new plan does not discuss the IRLNEP contracted grant writer available to members.	The grant writer is available to members
10/24/2018	Jason Brown, Indian River County	Overall	It is recommended that the Plan document be one that outlines items that can be utilized for concrete actions.	Actions are listed in tables for each of the vital signs
10/24/2018	Jason Brown, Indian River County	Introduction	It is recommended that in the introduction to the Plan, the introduction should clearly state its intended purposes and how to use the Plan's information.	This information is included in the sections starting with CCMP Revision: IRLNEP Responds to a Changing Lagoon through How To Use this Plan

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
10/24/2018	Jason Brown, Indian River County	Overall	The majority of the Plan consists of more general discussions of thirty-two items defined as "vital signs." The data in the Issue Summary sections might be identified as useful for reports or presentations, or to reference in grant applications.	Noted - the information in the Issue Summary sections can be used to support grant applications, presentations, and other needs
10/24/2018	Jason Brown, Indian River County	Overall	Does the Plan include Chapter 298 water management districts?	The Chapter 298 districts were contacted for projects and any projects provided will be included in the Projects Plan
10/24/2018	Jason Brown, Indian River County	Overall	Of the \$2,100,000 yearly funding, are there specific categories/vital signs that will receive the majority of the annual funding? The entire \$2,100,000 could easily be used by a single regional pollutant reduction project. Does the IRL Council plan to focus its funding on small community projects or provide funds to support high dollar projects.	The IRLNEP will continue to fund projects related to restoration, science and innovative technologies, citizen engagement and education projects, as well as small grant projects
10/24/2018	Jason Brown, Indian River County	Overall	As a general comment it appears that many of the figures have small text that has become blurry/illegible (presumably due to pdf file compression) and higher resolution images are recommended. Specific pages with resolution issues include pgs. 3, 4, 10, 11, 22, 36, 58, 62, 72, 77, 80, 84, 93, and 102.	The graphics are being modified for the final document
10/24/2018	Jason Brown, Indian River County	Measuring Changes in IRL Vital Signs (Page 12)	Second paragraph, first line recommend removing "s" from "shows."	Corrected
10/24/2018	Jason Brown, Indian River County	Legacy Loads and Healthy Sediments (Page 32)	Issue Summary, paragraph three - footnote superscripts and typo in word "macro benthos."	Corrected
10/24/2018	Jason Brown, Indian River County	Overall	The CCMP should have a section addressing the "State of the IRL 2018." If the current state of the IRL is detailed under one section, I think it may educate the reader and bring more light to some of the action items needed/required.	The current state of the IRL is included in a separate document and is summarized for each Vital Sign under the Issue Summary sections
10/24/2018	Jason Brown, Indian River County	Measuring Changes in IRL Vital Signs	Measuring Performance & Progress may require further clarification to show how the action items are monitored (i.e. Septic to sewer action, what is the indicator for success, Seagrass coverage?	The indicators and targets listed in the CCMP will continue to be updated over time

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
10/24/2018	Jason Brown, Indian River County	Overall	Is there a need for a performance based cost/lb. removed so that the necessary and limited dollars can be spent on the most efficient/effective projects?	It was decided that the project focus should not be solely on cost/lb but on what projects are most needed in each portion of the lagoon
10/24/2018	Jason Brown, Indian River County	Appendices	General comment about the referenced Appendices not included in the downloaded draft version that was reviewed.	Appendices are included in the updated draft
10/24/2018	Jason Brown, Indian River County	Wastewater (Page 21)	Under the reclaimed water paragraph, it states that "Currently, no regulations exist for the concentration of nutrients in reclaimed water for irrigation." Per Florida Administrative Code (FAC) 62-610.510, The Nitrate concentration in the applied reclaimed water shall not exceed 12 mg/L (as Nitrogen) unless reasonable assurance is provided in the engineering report that Nitrate as measured in any hydraulically down-gradient monitoring well located at the edge of the zone of discharge established in accordance with FAC 62-522.600 will not exceed 10 mg/L or background levels in the receiving ground water, whichever is less stringent.	This section was reworded
10/24/2018	Jason Brown, Indian River County	Wastewater (Page 21)	Biosolids: As Class B Biosolids are the only treated Biosolids that require a permitted facility for land application, the words Class B should be inserted in this paragraph before any reference to Biosolids.	According to the rule, all land application sites must have a permit
10/24/2018	Jason Brown, Indian River County	Wastewater (Page 22)	6th Bullet item under strategies: Conduct research to track where ALL CLASSES OF biosolids are being applied and to determine the nutrient and other pollutant content. This will cover the un-monitored application of further processed Class AA Biosolids in addition to the Class B Biosolids.	Added language
10/24/2018	Jason Brown, Indian River County	Wastewater (Page 22)	Add another bullet: Provide funding for innovative Biosolids handling, treatment and disposal techniques.	Added to list of Strategies
10/24/2018	Jason Brown, Indian River County	Wastewater (Page 22)	Add another bullet: Provide funding to assist homeowners (property owners) on the connection cost/abandonment of existing septic tank systems in order to connect to the centralized sewer.	Added to list of Strategies
10/24/2018	Jason Brown, Indian River County	Wastewater (Page 23)	Add an item to address Biosolids handling and disposal approaches.	Added to list of Strategies

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
10/24/2018	Jason Brown, Indian River County	Wastewater (Page 24)	Regulatory hurdles, such as reclaimed water disposal to stormwater ponds that have a surface water discharge is a current barrier to success even when the reclaimed water is treated through an AWT	Added to list of Challenges to Success
10/24/2018	Jason Brown, Indian River County	Stormwater (Page 26)	Towards the end of the bottom paragraph — When properly designed, delivered AND FOLLOWED, agricultural BMPs are practical, cost effective actions.	Revised wording
10/24/2018	Jason Brown, Indian River County	Stormwater (Page 27)	Under Strategies — add another bullet item - Ensure adherence with agricultural BMPs through a routine monitoring program and compliance with surface water and groundwater standards.	Added to list of Strategies
10/24/2018	Jason Brown, Indian River County	Stormwater (Page 28)	Under barriers to success — Agricultural producers presumed compliance with BMPs as opposed to demonstrating that the BMPs are maintaining compliance through routine monitoring.	Included in list of Challenges to Success
10/24/2018	Jason Brown, Indian River County	Stormwater (Page 28)	Under barriers to success add a new bullet item: Inadequate data on use of Class AA Biosolids (fertilizer) application information.	Included in list of Challenges to Success in the Wastewater section
10/24/2018	Jason Brown, Indian River County	Hydrology and Hydrodynamics, Legacy Loads and Healthy Sediments, Atmospheric Deposition	Pages 29 — 37 — It is unclear as to the estimated contributions from the sources referenced — as 45 to 60% of the TN and TP is estimated to come from groundwater and sub-surface water discharge (page 29), Page 32 references in the second paragraph that the estimate for the annual release of N&P from the muck is about as much as the external load delivered by stormwater AND groundwater according to Brevard study. The 2018 Janicki presentation at the Biosolids Symposium in Stuart shows about 37 to 42% of the loading to the lagoon coming from run-off (a few slides from the Janicki presentation are attached — Janicki Environmental is the same organization that is referenced in Footnote 7 on page 29 as saying groundwater and sub-surface water may contribute 45-60% of the loading), and on page 36 Atmospheric deposition over the lagoon ranges from 6 to 46% of the loading. These sources seem to account for well more than 100% of the loading in the lagoon?	Numbers have been updated in preliminary final draft

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
10/24/2018	Jason Brown, Indian River County	Contaminants of Emerging Concern (Page 39)	Since temperature is addressed in this section as an emerging concern, should the changes in salinity due to the introduction of Freshwater and /or Saltwater also be covered in this Section? Changes in salinity levels impact the wildlife populations and breeding ranges for many species.	Salinity impacts are discussed in Filter Feeders, Connected Waters and Watersheds, and Harmful Algal Blooms sections
10/24/2018	Jason Brown, Indian River County	Overall	It would be helpful if the report included a single, comprehensive action plan list/matrix.	The full list of actions are included in Appendix A
10/25/2018	Adam Locke, CAC Member	Overall	Non-motorized access to our Indian River Lagoon is often overlooked. Each Causeway that crosses the Lagoon and each park that is located on the lagoon should be considered as an access point for non-motorized recreation: windsurfing, kitesurfing, kayaking/canoeing, sailing (Catamarans, Small boats, beach launch craft), rowing. Recreational opportunities always began with access. But sometimes access can be difficult if it is not recognized by park managers or engineers who are tasked with repairing storm damage or even managing the public's needs. In the past we have seen natural launches destroyed by hardening of a shoreline with rock or riprap without regard to the impacts of non-motorized recreation. It would be great if we could include these access points into our "Boater Guide." I would also be interested in working with Frank and others to help locate areas that have historically been utilized for these activities. Another positive step forward would be to identify storm damaged, lost or non-existing access and make available grants and funding for municipalities that plan to install natural access points for these activities and replace hardened shorelines with safe points of entry. Parking for these access points is also very important, without the ability to park or even back a trailer up even the best locations could limit the number of recreational users. Natural is always the best and preferred when we are talking about costs and what the public would like to see.	Non-motorized access will be included in Boaters Guide to the Indian River Lagoon

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
10/25/2018	Vince Lamb	Overall	<p>When I first became seriously interested in Lagoon health after the 2011 Superbloom, I read the existing CCMP for the IRLNEP. The CCMP was loaded with summaries of many great projects, but very few were undertaken due to funding inadequacies. The political will to provide funding simply was not there for much beyond the specialty license plate. Reviewing the current draft plan, the potential inability to find adequate funding is listed as a Barrier to Success for many of the potential actions. I searched the draft CCMP for the words advocacy and lobbyist; no matches were found. I am unsure of the proper role for the IRL NEP in encouraging advocacy and engaging lobbyists, but I have watched the Executive Director demonstrate leadership in advocacy and essentially serve as a lobbyist (maybe not the technical definition). I believe strongly that securing the government funding to achieve clean water and healthy habitats will require organized advocacy. I doubt that the truly large sums needed to remove septic tanks and fix the Lake O problems can be found without engaging lobbyists. Perhaps we can effectively utilize the lobbyists of our partners as an alternative to hiring them directly (as examples, Brevard County and Florida Tech utilize lobbyists). I feel that a section on advocacy and the efforts needed to find funding should be added to the CCMP.</p>	<p>The IRLNEP is focused on education and providing information. Other stakeholders in the area are providing lobbying services. The IRLNEP will use the CCMP to work with partners to obtain funding for CCMP implementation</p>
10/25/2018	Vince Lamb	Overall	<p>The draft CCMP contains many "TBD" in the Estimated Cost column. While many of the items are perhaps impossible to estimate accurately without extensive work, it would be useful to have details for the major ones that would allow a meaningful total to be computed. I feel that a total for the most important action groups would be helpful, like the funds needed to remove or greatly improve all septic systems within 50 meter, the total amount to remove the muck, perhaps not including canals, etc.</p>	<p>Costs are provided throughout the plan and costs for individual projects will be included in the Projects Plan.</p>

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
10/25/2018	Vince Lamb	Wastewater (Page 23)	Under the Wastewater Action Plans Output Wastewater 4, the total cost of \$392 Million seems very low. Brevard County has 15,000 septic systems located within 50 meters of the Lagoon or its tributaries. At \$20,000 each, the total for convert to sewer or upgrade to nutrient reducing systems would total \$300 Million. Brevard County has perhaps a third of the septic systems in the IRL watershed, so the true total could be closer to \$1 B.	The cost of \$392 million came from the projects submitted for the Projects Plan
10/25/2018	Vince Lamb	Connected Waters and Watersheds	The common suggestion among residents is to build a new inlet to flush the Lagoon. Many wonder why we are spending so much money on various projects when this solution could quickly clean the Lagoon. When you get more deeply involved, you learn that creating a new inlet is not a viable option, perhaps mostly due to shoreline erosion caused by inlets. I remain an advocate of a one directional flow of ocean water into the Lagoon with careful controls and extensive monitoring. The Florida Tech IRL Research Institute has done lots of analysis and preparatory work. Perhaps right s could be negotiated with private landowners just north of Patrick AFB would be the best option. If analysis shows a favorable cost-benefit ration that reduces N and P effectively, a project of this type could provide nutrient reduction and provide a "proof of concept" that could lead to larger projects of this nature in future years.	Noted - potential options for connections are being evaluated
10/30/2018	Dianne Hughes, Martin County	IRLNEP Management Conference (Page 6)	CAC - Crystal Lucas -Martin County - Crystal lives in Oregon now.	Moved Crystal to list of former CAC members
10/30/2018	Dianne Hughes, Martin County	Measuring Changes in IRL Vital Signs (Page 12)	A possible target for septic conversions could be "connect all septic tanks within, 1 mile or 1/2 mile or whatever is appropriate, radius of surface waterbodies." We probably don't need to connect all of them.	Added to table
10/30/2018	Dianne Hughes, Martin County	Measuring Changes in IRL Vital Signs (Page 12)	Stormwater target - pre-development runoff should equal post-development runoff - the state stormwater rule that is sitting on a shelf should be implemented.	Added to table

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
10/30/2018	Dianne Hughes, Martin County	Wastewater (Page 20)	Is there any way to discuss the success of hooking up package WWTP's? We know what we have done in Martin County as a part of the Indian River Lagoon Act - 70 package plants connected, etc.	Added information to the Issue Summary
10/30/2018	Dianne Hughes, Martin County	Stormwater (Pages 25 and 26)	Urban Stormwater - The text doesn't refer to the table below - suggest numbering Tables and referencing them in the document.	This table was deleted and the projects will be included in the Projects Plan
10/30/2018	Dianne Hughes, Martin County	Citizen Engagement and Education (Page 109)	The Be Floridian Now program was implemented in 2015 on the east coast.	Added date to text
10/30/2018	Dianne Hughes, Martin County	HABs (Page 81)	For a County that has experienced several blooms I was unaware that this report existed - Preliminary Strategic Plan for Algal Toxins and Aquatic Animal Health in the Indian River Lagoon	This reference was deleted since the plan was never finalized
10/30/2018	Dianne Hughes, Martin County	Overall	All of the figures/images appear blurry - not sure if that is because it is a web document or not.	The graphics are being modified for the final document
11/1/2018	Jenni Lamb, City of Melbourne	Wastewater (Page 21)	Reclaimed Water - the statement "Today, many WWTPs use their treated effluent for reclaimed water irrigation while other options... exist..." Municipalities are required to have a certain percentage of reclaimed water as part of their consumptive use permits (issued by St. Johns River Water Management District). It seems that regulatory agencies (FDEP and SJRWMD) are in conflict with themselves in regards to reclaimed water. This makes it very difficult on municipalities.	Noted
11/2/2018	Judy Orcutt	Overall	The Clean Water Coalition (CWC) of Indian River County is a newly formed non-profit organization designed to promote clean and adequate water for the county and a clean and safe Indian River Lagoon. That said the CWC fully supports the efforts of the IRL-NEP and their CCMP for 2030. We appreciate the opportunity to make some observations and share some thoughts in that regard.	Thank you!

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
11/2/2018	Judy Orcutt	Overall	<p>One of the critical variables, from our perspective, in the success or failure going forward is that without enlightened environmental leadership at the state and local levels of government it will be impossible to secure the necessary funding for IRC to make long term plans and to take timely corrective actions. We recommend that the CCMP make statements in its report to call for sustained long-term funding for the IRL and the 5 counties to secure matching funds from the state to make meaningful and timely progress toward the clean water goals of the report. We believe it is important to state the range of funding thought to be required to restore the IRL over a 10-20-year period. We are fearful that the IRL in some areas may well be at or past the tipping point of becoming an algae-dominated system. The events over the past year seem to lend credence to this assessment.</p>	<p>The need for funding is described in the introduction sections and the funding amounts are provided in each Vital Sign section</p>

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
11/2/2018	Judy Orcutt	Overall	<p>In analyzing the failure of our state government to control pollution to date, it also occurs to us that the actions taken in 2016 to discontinue the previous permitting system used to specify exactly how much nitrogen and phosphorus polluters could put in the water verses the current Basin Management Action Plans (BMAPs) with only volunteer measures and no oversight is not acceptable. It occurs to us that Florida needs “trust but verify system” for permitting farmers, industries and municipalities to control the amounts of nitrogen and phosphorus entering our waterways. Without accountability, we believe the management system currently in place cannot be trusted to deliver adequate safeguards for the environment. We encourage the adoption of a sustainability strategy as a guiding principal regarding the changes required to remove the IRL from the EPA’s impaired waters list. Florida is expected to have an additional 6 million residents by 2030. Climate scientists are predicting rising seas, warmer waters, salinity changes, increased rainfall and storm events by 2030. It is imperative to plan for these changes in consumptive use permitting, sewage infrastructure planning, and calculating nitrogen and phosphorus input from septic tanks and increased stormwater. We would also support as much focus as possible prioritizing the corrective measures that should be taken with current level of information available to the CCMP drafters. We believe that the IRL counties and the state need to have a much greater sense of urgency regarding all enhancements and improvements to the system.</p>	<p>Noted - Strategies to remove the IRL from the impaired waters list are included in the One Lagoon - Water Quality Vital Signs. The IRLNEP decided not to prioritize the corrective measures and instead let the local stakeholders identify what measures are most needed in each portion of the lagoon</p>

CCMP Revision Additional Comments on July Draft

Date	Name	Action (Page # From Draft)	Comment	Response
11/2/2018	Judy Orcutt	Wastewater	The Clean Water Coalition recommends that the limited funding available to be directed toward our root cause of excessive nitrogen: the handling of human waste. Sewage plants need to be updated to tertiary treatment, failing infrastructure needs to be replaced, septic tanks should be connected to municipal sewage, reuse water for irrigation must have low nitrogen content, biosolids should not be spread on farmland. We recommend that new technologies be funded by the state that would treat waste without damaging the environment. With the combination of rising seas, a diminishing aquifer and increasing population it might be prudent to begin consideration toilet to tap technology.	Noted - estimated funding for these efforts is included in the Wastewater section and costs for specific projects are included in the Projects Plan
11/2/2018	Judy Orcutt	Stormwater	We also believe that stormwater treatment projects are of vital importance for two reasons: to capture and clean water before it enters the lagoon and to recharge our precious aquifer.	Noted
11/2/2018	Judy Orcutt	Overall	We also would like to recommend 2 policy changes that could make a significant impact on water quality. The Indian River Lagoon should be declared a No Discharge Zone by the State of Florida. The impaired water body status under the BMAP program qualifies the IRL for this declaration. Additionally, land development codes in Florida should limit the use of sod, exotic plants and the use of fertilizer in the landscape. Requirements in the code should require a high percentage of native plants.	These items can be evaluated when implementing the actions for the Federal, State, and Local Policy Opportunities Vital Sign