



Save the Manatee® Club

The Voice for Manatees Since 1981

December 27, 2017

Submitted via electronic mail to Brett Cunningham

Re: Mosquito Lagoon Reasonable Assurance Plan (RAP) Pollutant Load-Reduction Projects Report December 2017

Dear Brett,

We have reviewed the Subject report and offer the following comments and questions for consideration by the consultants and stakeholders:

1. We understand that distance plays a factor in the feasibility of septic to sewer conversion, but were surprised to find no mention of advanced treatment options for septic tanks within the footprint of the RAP. We attended informational meetings that preceded development of the Draft BMAP for Volusia Blue Spring and learned about a number of options that boost treatment for residential septic systems. We believe some of these alternatives may have merit for the RAP as well. One option for helping residents to fund advanced treatment options and/or eventual conversion to sewer would be a septic utility, whereby owners of active septic tanks pay an annual fee that their city or the county can use to fund treatment/conversion projects. The minor role that septic tank conversion plays in this report is also unexpected given that the Mosquito Lagoon is identified in the County's 2015 Water Quality Plan as a priority area for removal of septic. It should also be reinforced that no new development in the watershed be allowed to install a septic system that doesn't also include advanced treatment and that installation of any septic, even with advanced treatment, be avoided whenever possible.
2. Do options 7 & 9 include the cost of replacing BAM once its ~15 year lifetime has been expended?
3. We are skeptical that education/outreach can achieve the estimated load reductions in the report. We would need to see a robust plan to have much faith in such efforts. Were Volusia County ever able to enforce a summer sales ban on fertilizer, that would certainly help. Local governments could also enforce landscaping requirements that promoted use of native, more drought tolerant plants, and backyard buffers where mowing and fertilizing are not needed, for waterfront properties.
4. For projects that would utilize pump stations, will those be paired with gas-powered generators so they can operate during times of power outage, such as hurricanes? If so, are those costs built into the estimates provided?
5. We believe that projects to eliminate any routine discharges from waste water treatment plants within the watershed should be included in the proposal. Some cities within the watershed have prioritized zero discharges, and any remaining cities creating routine discharges should follow suit. Appropriate projects would include building and/or enhancing infrastructure to store and reuse treated wastewater.
6. Projects to reduce stormwater canal outflows to Mosquito Lagoon during "normal" conditions should be pursued. The water in these canals can be retained to allow percolation back to the aquifer below and/or reclaimed for use.
7. Are funds for water quality and habitat monitoring secure so that the benefits of the RAP can be quantified in the coming years? If not, who will bear those costs?

Thank you for considering our questions and comments.

Sincerely,

A handwritten signature in black ink that reads "Katie Tripp". The signature is written in a cursive style with a horizontal line above the "i" in "Tripp".

Katie Tripp, Ph.D.
Director of Science and Conservation

cc: Tiffany Busby, Tony Janicki