

SUMMARY OF SPECIFIC COMMENTS (PDF FILES ATTACHED)

COASTAL HEALTH

- **Environmental Protection Agency:** The Environmental Protection Agency provided detailed comments on the Aquatic Invasive Species, Habitat/Species, Coastal Health, Areas of Concern/Sediments, Nonpoint Source, Toxic Pollutants, and Indicators and Information sections of the draft report.
- **Ohio DNR:** Should include elimination of untreated or inadequately treated human waste from private septic systems; need to include costs for research and new regulation with recommendation 2 (page 24).
- **Buffalo Niagara Riverkeeper:** The plan needs to recognize the need to make all waterways swimmable- not just beaches; need to address failing septic systems as well as public systems.
- **Joan Rose, MSU:** In order to develop a risk-based framework, need to address microbial contaminants of concern; need more research, especially on the role of disinfection; should consider a waterborne disease registry for the GL basin; need to make better use of land use-weather/climate-water quality risk models to better prioritize risks; more studies on birds and wildlife and human health need to be done; I support a comprehensive watershed and beachshed approach using monitoring data, sanitary surveys, and risk-based frameworks.
- **Crop Life America:** The plan needs to adequately address wet weather-associated effluent issues; characterization of industrial waste as being included in untreated or inadequately treated effluent is inaccurate as it relates to agribusiness.
- **Great Lakes Nonpoint Pollution Coalition of Wisconsin:** The fact that metropolitan areas discharge under certain conditions gives the agricultural community an excuse to do nothing; there is a high degree of human health threat related to exposure to human pathogens.
- **Council of Great Lakes Industries:** The characterization of "industrial waste" (in the recc section) as being included in "untreated or inadequately treated effluent" is inaccurate; the real challenge regarding the CSO issue is how to fund these infrastructure needs.
- **Natural Resources Defense Council:** The draft plan is a significant step toward improved GL coastal health; need to fully fund monitoring programs and endorse real time beach testing; need to explicitly include Pretreatment programs in the Plan; need to strengthen stormwater management; fund sanitary surveys to identify indirect sources of beach contamination; and strengthen drinking water source protections.
- **Dolores Watson:** My request is that it become routine policy to post a warning at every public beach immediately after the NEORS D determines there may be a CSO event.

- **Northeast Ohio Area Coordinating Agency:** NOACA supports establishing a \$7.5 billion grant program for waste water treatment and wet weather controls; recommend that CSO grant program include a set-aside for regional planning; NOACA supports use of risk-based approach for managing recreational waters; supports full funding of CWA State Revolving Funds for both wastewater and drinking water.
- **Tug Hill Commission:** Comments include specific recommendations on the coastal health, habitat, indicator and information, non-point source, toxic pollutants, and sustainable development sections of the report.
- **Brian Smith, Citizen's Campaign for the Environment:** Plan should speed up the timeline for SSO and CSO abatement.
- **E. John Trimberger, Izaak Walton League:** Eliminate all sewage discharges; stormwater must be retained and treated.
- **St. Clair River Binational Public Advisory Council:** Need full funding of required storm water management programs; identify and eliminate illicit discharges from private disposal systems.
- **Charlotte J. Read:** Eliminate CSOs; restrict development that exacerbates CSOs; retain and update state plans under the Coastal Zone Management Act.
- **F. Ned Dickman and Micheal J. Fischer, Great Lake's Boating Federation:** Health risks from bacteria and pathogens effect recreational boaters; need a public awareness campaign amongst boaters about hazardous water conditions.
- **Concerned Groups' Collective Comment on Great Lakes Regional Collaboration Draft Plan (Also submitted separately by Tip of the Mitt Watershed Council):** The deadline for CSO cleanup should be 2015; prioritize communities with good stormwater management; need industrial pre-treatment; need a regulatory program for indirect pollution sources; need real-time beach testing; need drinking water source protections; enforce current law.
- **Richard Hyde, City of Waukegan:** Emphasize shoreline protection; need protection/restoration of bluff and ravine ecosystems; need a timeframe for detection and dissemination of information regarding beach closures; need federal funding for Recommendation #1; need to reconsider funding for Recommendation #3.
- **EPA Waste, Pesticides and Toxics Division:** Include land-use planning and BMPs in Recommendation #3; a 90-95% reduction in contamination is unrealistic.
- **Gary Gulezian, Council of Great Lakes Industries:** Funding of infrastructure needs to address funding options.
- **Ohio Environmental Protection Agency:** 2020 goal for elimination of CSOs is unrealistic; the 2009 interim milestone for storm water control is unclear, continue full

funding of the DWSRF at 2004 level; proposed grant program for addressing wet weather discharges unworkable; outlines alternatives to grant program.

- **Northeast Ohio Regional Sewer District:** Inaccurate citation of the number of waterborne disease outbreaks; inaccurate reference to the timeframe specified by the CSO Control Policy; inadequate funding to control CSOs; complete elimination of CSOs is not cost-effective; realign goals with existing federal and state policies.
- **Bruce W. Fowkey:** Outlaw new subdivisions that don't have the capacity to handle their sewage.
- **Paul J. Weidenhamer:** The biggest problem in the Lakes is the dumping of partially treated sewage water into lakes and streams.
- **Leslie Blessing:** While rowing on the river, sees brown sewage scum days after a rain.
- **Ray Kress:** Build a canal from the Kinnickinnic River in Milwaukee to the Fox River in Waukesha to reverse the flow of the Kinnickinnic River from Lake Michigan to the west.
- **Peggy B. Johnson:** Agrees with the primary goal of elimination of SSO and CSOs by 2020.
- **Robert Kodanko, Waukesha County Divers Association:** Protection of near shore waters and coastal areas is the highest priority.
- **Kenneth W. Fallows, Toledo Metropolitan Area Council of Governments:** CSO grant program should include a set-aside for planning; strategy should recognize that bacterial contamination also originates from private septic systems.
- **John Beeker, Northeast Ohio Areawide Coordinating Agency:** CSO grant program should include a set-aside for regional planning; need a more aggressive, risk-based approach for managing recreational waters; fully fund the Clean Water State Revolving Fund.
- **Chuck Hersey, Southeast Michigan Council of Governments:** There is a serious shortfall in investment in sewer infrastructure, which is a critical factor in wet-weather sewage overflows.
- **David Gard, Michigan Environmental Council:** More periodic flooding as a result of climate change could increase bacteria levels in the Lakes and require more frequent beach closings.
- **Wayne D. Howard, Rochester Regional Group of Sierra Club:** Need an accelerated timeline for the elimination of sewage inputs into the Lakes.
- **Gary Wilson:** Prioritizes improvements to sewage systems. Correcting this problem will provide easily measurable, politically popular results.

- **Jan O’Connell, Sierra Club Board of Directors:** Proper regulation of sewage treatment plants is required. New legislation in the Grand Rapids area has watered down requirements.
- **Richard Gibson:** Sewage runoff reduction will go a long way toward improving water quality.
- **Minnesota Board of Water & Soil Resources:** This organization prioritizes stormwater erosion and sediment control.
- **Great Lakes Sea Grant Network:** The network provided a series of general recommendations and a set of comments based on a series of workshops held during the 2003-2004 Great Lakes Restoration Workshop Series; in addition the network provided more specific comments on each of the 8 issue areas contained in the Draft report.
- **Northeast Ohio Regional Sewer District:** We would strongly encourage the GLRC to more prudently examine the feasibility of some of the goals developed in the Strategy. Of particular concern are some recommendations in the Coastal Health section of the report; in addition, NEORSO is dissatisfied with some respects in which the GLRC relies upon misleading applications of statistics and misinterpretation of current policy, as detailed in its comments especially with regard to the Coastal Health section; the report fail, in discussing a report prepared by the Center for Disease Control, to provide the proper perspective for the information presented could discredit the Strategy's legitimate documentation of needs; another fallacy in the draft strategy can be found in the justifications for calling for the elimination of CSO impacts by 2020.
- **Water Environment Federation:** In its comments, the WEF indicates the goals and recommendations it supports.
- **City of Chicago Department of the Environment:** We strongly support the recommendations in the Coastal Health chapter, especially the first one; we strongly support those recommendations that call for funding and actions to protect and improve our drinking water.
- **Robert Greytak:** While the proposed construction grants will go a long way toward addressing CSO/SSO improvements, consider providing some grant money dedicated to support of engineering fees (no pdf attached).
- **Amanda Bosak:** Will there be money to help citizens address problems associated with septic tanks?
- **Michigan Division of Izaak Walton League:** There is a need to control all sewage discharges to surface waters.
- **Ohio Environmental Council:** The comprehensive approach to the sewage threat should include support for real-time beach testing and industrial pretreatment of

wastewater and the prioritizing of funding for communities who have implemented good storm water management (no pdf attached).

- **Izaak Walton League of America:** Suggest use CWA to eliminate all sewage dumping ASAP; improve stormwater technologies to eliminate CSOs; pre-treat all industrial waste water with the latest available technology; drinking water free of contaminants should be made available to all GL residents.
- **Joseph Koncelik, Ohio EPA:** The Ohio EPA provided specific comments on goals and recommendations in this section of the report.
- **Steve Hoin:** I suggest that incentives be provided for local municipalities to upgrade treatment systems to address any mercury using BAT with the understanding that the WWTP would be encouraged to accept mercury.
- **David Hohmann:** Stormwater controls need to be implemented post-construction, even in developed areas.
- **Jim Sweeney:** Any sewage facility that cannot treat all its effluent properly should not be allowed to issue more permits.
- **Robert and Lorraine Noon:** Their comments raise questions about the source of ecoli and sewage they now see on their property on the western shore of Lake Michigan.
- **Heather Harris-Brady:** As an engineer working on the GL for 57 years, we are convinced that there is not enough money to support large centralized infrastructure for waste water treatment; we favor decentralized solutions.
- **Alliance for the Great Lakes:** The most effective way to stop sewage and stormwater overflows is by preventing stormwater at its source; we recommend an increased focus on industrial pre-treatment program.
- **Macomb County Environmental Prosecutor (and Others):** The funding recommendation in the Plan should be seen as a mere down payment on this problem; the plan should clearly define the roles of participants in developing risk-based testing protocols.