

SUMMARY OF SPECIFIC COMMENTS (PDF FILES ATTACHED)

HABITAT/SPECIES

- **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:** Goal to develop predictive models to improve fish stock assessment is unclear; goal to design a coastal shore and upland habitat conservation program should include the Coastal and Estuarine Land Conservation Program; should recognize the importance of working lands as well as protection and restoration.
- **Paul Fuhrmann:** collaboration and partnerships with interested parties is critical.
- **The Nature Conservancy:** In its comments, The Nature Conservancy includes general observations as well as specific comments on this Section of the report.
- **NYPIRG:** We, along with Great Lakes United, advocate for the federal government to replace current wetland guidance with pre-SWANCC CWA protections for "isolated" wetlands; NY state must include in its regs wetland areas less than 12.4 acres in size.
- **Council of Great Lakes Industries:** The goals in the goals/milestones section appear arbitrary- they must be scientifically justified and include measurable ecosystem based outcomes.
- **Northeast Ohio Area Coordinating Agency:** Supports enactment of a Great Lakes River Restoration Act funded at \$40 million annually.
- **Michigan Dune Alliance:** Submitted its 2005 Eastern Lake Michigan Coastal Conservation Plan which it feels is especially relevant to Habitat/Species, Sustainable Development, Indicators and Information, and Aquatic Invasive species teams.
- **Lake Ontario Committee of GLFC:** American eel and Atlantic salmon should be included in the list of native fish species; it would be helpful to draw a more concise connection between re-establishment of native preyfish communities and restoration of food web function.
- **Audubon:** It is important to include local groups in creating healthy habitats for birds and wildlife; the Plan should fund the collection of data and conservation work in Important Bird Areas.
- **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.

- **Anna Hoekstra:** Improvements could be made to the Draft Action Plan by emphasizing wetlands protection and habitat restoration.
- **John Beeker, Northeast Ohio Areawide Coordinating Agency:** Urbanization of streams in relatively undeveloped areas currently in possession of high water quality is the most significant water quality threat to northeast Ohio; high water quality stream conservation should be combined with efforts at restoring heavy degraded urbanized streams.
- **Gildo Tori, Ducks Unlimited:** Provide incentives to farmers to improve water quality; ecological goods and services that wetlands provide should elevate wetlands to a high priority of the GLRC.
- **Wayne D. Howard, Rochester Regional Group of the Sierra Club:** More emphasis is needed on the prevention of further wetland degradation, not just restoration; Lake Ontario's levels are a particular concern; "Plan B" in the study done by the International Joint Commission on the Great Lakes strikes the best balance and should be included in the collaborative recommendations.
- **Peggy B. Johnson:** Smart growth policies need to be promoted and targeted at local communities; add emphasis to tributary rivers and riparian areas to build political support for the lakes.
- **Ohio Environmental Protection Agency:** Include a milestone for protection of existing high-quality wetlands in the short-term goals; increase discussion of the importance of coastal and upland wetlands.
- **Robert D. Hoffman, Ph.D, Ducks Unlimited Great Lakes/Atlantic Regional Office:** Separate non-point source section and habitat/species section's wetland restoration recommendations; advocate development of a new policy to protect "isolated" wetlands lost as a result of SWANCC court decision; reevaluate current regulatory process for wetland restoration; create proactive, voluntary incentives for farmers to aid with the creation of 355,000 acres of uplands and buffer strips.
- **Ronald D. Harnack, Minnesota Board of Water and Soil Resources:** Priorities include forest management and protection of riparian buffers to maintain cold water temperatures and water clarity in trout streams and lakes and shoreline and streambank erosion and sedimentation control to protect and restore instream and nearshore fishery habitat and wetland resources.
- **Brian Smith, Citizens Campaign for the Environment:** Improve the protection of existing wetlands, including so-called "isolated" wetlands; abandon federal guidance that requires the Army corps of Engineers to gain headquarter approval before asserting protection of the Clean Water Act on "isolated wetlands."
- **E. John Trimmerger, Michigan Division and Dwight Lydell Chapter, Izaak Walton League of America:** \$550 million for 550,000 acres of wetlands is insufficient; protect tributaries to the Great Lakes and drowned rivermouth lakes; remove barriers impairing

free movement of fish; fund federal programs containing conservation measures at their authorized levels to help restore habitat; create and maintain buffer strips in urban and suburban areas.

- **St. Clair River Binational Public Advisory Council:** Funding recommended is short of what is needed to meet goals; partnerships with other fund sources will be necessary.
- **Charlotte J. Read:** Protection of wetlands now declared isolated and not protected by federal law must be a high priority.
- **Concerned Groups' Collective Comment on Great Lakes Regional Collaboration Draft Plan (Also submitted separately by Tip of the Mitt Watershed Council):** Terrestrial invasive species should be addressed as a critical threat to habitat integrity; tributary restoration recommendation 3 be rewritten; the wetland restoration recommendation in the Nonpoint Source Section should be above and beyond the Habitat/Species recommendation; advocate protection of "isolated" wetlands; reevaluate regulatory approach to wetland restoration; strengthen recommendation four of Rare Biological Systems by noting that the lakes basin is home to 41 globally rare plant and animal species; dedicate attention to urban areas in any coastal habitat restoration effort; explicitly state the long-term goal of one million acres of added wetlands in recommendation two; include a short section to clarify which specific programs could be used to support the recommendations and the key reforms needed to these programs to make them more effective; note the need to effectively employ section 404 of the Clean Water Act when mentioning wetland protection; include a map to demonstrate the potential geographical extent of the recommendations.
- **Joel Brunsvold, Illinois Department of Natural Resources:** Second bullet under the goals and milestones section seems contradictory to the discussion about aquatic invasive species; goal that states there should be restoration of the hydrology of rivers is very difficult and highlights competition for water between habitat and humans; view habitat at the basin wide level to better understand the contribution from different habitat types; create a process to prioritize and inventory habitat types to identify funding needs.
- **City of Waukegan:** Goals and milestones for open/near shore waters to encourage self-sustaining populations of non-native game fish to stabilize fish communities is unclear; cost per unit acre of wetland restoration in Recommendation 2 is inadequate; include commitment to prevent further wetland losses to the basin; add a no-net-loss of wetlands within the basin as a goal; modify Recommendation 3 to indicate new regulations as an alternative to easements, acquisition, or cost share projects; require buffers for all coastal communities.
- **NOAA:** Problem statement is unclear; rewrite and reorganize problem statement to explicitly state the problem and provide supporting information; shorten and tighten the language throughout the section to make paragraphs shorter; ensure better consistency in the language used for the goals; history and purpose of the Great Lakes River Restoration Act is unclear; clarify the meaning of "hydrologic retention" on page sixteen; better define "tributary" on page 17; consideration of outcomes on page 17 deserves its own

paragraph and may be expanded; rephrase "NOAA coastal programs" to "NOAA coastal and habitat programs" on page 18; clarify the phrase "restore the hydrology" on page 18 for the public; Under Habitat Species Appendix#5, the Coastal Zone Management Act of 1972 should be listed as a relevant policy/law under the Open/nearshore waters, Coastal Wetlands, and Streams, Tributaries, and connecting channels categories.

- **EPA Region Five Waste Pesticides and Toxics Division:** New York and Pennsylvania should be included in the state-by-state list of extirpated species.
- **The Nature Conservancy Great Lakes Program:** Add a sentence in problem sentence, last paragraph, second sentence to underscore the importance of protecting representative examples of the full range of Great Lakes biodiversity; add reference in the Problem Statement about the fact that there are 41 globally rare endemic species and natural communities in the U.S. portion of the Great Lakes region; add a long-term goal to each relevant habitat type to continue recovery progress for state and federally listed species and communities; siting of towers/structures that negatively impact bird migration is a cause for concern; revise, clarify, and fact-check appendices 2, 3, 4, 6, and 7; Recommendation #2 and #4 must recognize importance of protecting diverse wetland habitats; coordinate Recommendation #2 with Nonpoint Source Strategy Team recommendation on wetlands; further develop Recommendation #3 to promote sustainable water management; add a short-term goal to adopt a method to characterize or classify watersheds based on degree of altered hydrology; build upon scientifically-based principles to pursue sound water management; coordinate recommendation #3 with Nonpoint Source Strategy Team recommendation #5; translate short-term Coastal and Upland Habitats goal into a specific action assigning it to a lead Federal Agency.
- **Richard D. Swenson, Animal Husbandry and Clean Water Division, USDA/Natural Resources Conservation Service:** Objectives identified in problem statement could be better utilized in "Goals and Milestones" section; long and short-term goals in Section II Open/Nearshore Waters include only fish but should include wildlife; goal of creating "self-sustaining non-endangered levels for all currently listed wetland wildlife species, as determined by the state Department of Natural Resources" is unrealistic; Goal 1 in Coastal and Upland Habitats should have a specific numerical goal or threshold; delete "as soon as possible" from interim milestone in Goal 1 in Coastal and Upland Habitats; expand goal 2 to include all shoreline; consistent monitoring protocol for nitrogen and phosphorous is required; funding request for Riverine Habitats and related Riparian Areas appears arbitrary; budget summary priorities are in a different order than priorities stated in the beginning section; remove USDA Farm Bill from the last sentence in the first paragraph of Section three.
- **R. G. Micka:** Only Appendix three addresses the interface between human activity and the Great Lakes. This should become the hallmark for the strategic action plan.
- **John Beeker, Northeast Ohio Areawide Coordinating Agency:** Urbanization of streams in relatively undeveloped areas currently in possession of high water quality is the most significant water quality threat to northeast Ohio; high water quality stream

conservation should be combined with efforts at restoring heavy degraded urbanized streams.

- **Michael Naig, CropLife America:** To avoid seeming arbitrary, goals must be set in a context of what is possible, practical, and of sufficient quality to provide significant ecosystem value.
- **Buffalo Audubon Society:** Efforts should be made to decrease the destruction of existing wetlands in the Great Lakes region for commercial and residential projects; a goal should be set for the Army Corps of Engineers to deny some wetland permits or require developers to warn home buyers that they may need permits to develop a property.
- **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.
- **Amanda Bosak:** Should Lake Huron Tansy be included in Appendix? (no pdf attached).
- **Michigan Division of Izaak Walton League:** The recommendation to spend \$550 million to restore 550,000 acres of wetlands (one million in the long term) is not nearly enough.
- **Ohio Environmental Council:** Need to allocate more funds to wetland restoration and acreage should be doubled to 1.1 million acres over five year.
- **Izaak Walton League of America:** Encourage the restoration of GL tributaries and elimination of dams; use targets for wetlands restoration as starting points; need better regulation of wetlands.
- **Joseph Koncelik, Ohio EPA:** For wetlands, we would like to see the short-term goals include a milestone for protection of high quality wetlands.
- **B. Huberty:** Add money for mapping.
- **Todd Pollesch, GLFC Sport Fishery Advisor:** I would like to see the mass markings of all species of fish stocked in to the Great Lake; I don't think the plan has adequately addressed the potential impact of losing the sport fisheries in the Great Lakes
- **Lynn Garrity:** we cannot afford to lose any more time on studies and existing processes to maintain the hydrologic regime of this region.
- **David Hohmann:** Habitat destruction must be addressed within each local watershed, with federal and state funding support; wetland mitigation must be more than 1 to 1; controls need to be implemented to prevent the continued transport of trash and debris into our waters

- **Sharon Duerkop:** metrics on habitat are needed; large connected habitats should get the bulk of the resources
- **Alliance for the Great Lakes:** We urge that the Executive Committee demonstrate a quantifiable commitment to habitat restoration in urban areas
- **Great Lakes Water Institute:** Report should mention the social and economic benefits associated with dams and other hydro modification projects
- **Macomb County Environmental Prosecutor (and Others):** The plan needs to do more than purchase and restore wetlands; there is a need for identifying and mapping wetlands, and criteria should be set for local government measures to conserve wetlands