

SUMMARY OF SPECIFIC COMMENTS (PDF FILES ATTACHED)

NONPOINT SOURCES

- **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:** Regarding recommendation 2, page 32, consider use of trees as buffers.
- **Finger Lakes-Lake Ontario Watershed Protection Alliance:** Recommend adding on-site wastewater management and sewerage to reducing nutrients from antiquated septic systems; should include more discussion of Lake Ontario; recommend that you look at our organization as a model for coordination and program efficiency.
- **The Nature Conservancy:** In its comments, The Nature Conservancy includes general observations as well as specific comments on this Section of the report.
- **Crop Life America:** Design of NPS control programs and reduction goals need to be based on attainable and measurable targets; decisions regarding use of river or stream flow alterations to "hydrologically improve" surface or ground waters must include consideration of all benefits derived from impacted systems.
- **Great Lakes Nonpoint Pollution Coalition of Wisconsin:** Discussion in the report is weak on Agricultural source of nonpoint pollution, especially livestock waste; regarding TMDLs, we have not been able to develop a reasonable approach to non point source pollution.
- **Council of Great Lakes Industries:** The area targets described in recs 1-3 regarding wetland and buffer restoration appear arbitrary; need to include a discussion of benefits of stream flow alterations when considering dams.
- **Northeast Ohio Area Coordinating Agency:** Supports recs to provide \$110 million annually for five years to restore wetlands and \$335 million for riparian buffers.
- **National Association of Conservation Districts:** the comments include a number of specific recommendations to various sections of the non point source portion of the report.
- **Robert Walter:** Nonpoint source pollution is best dealt with at the local municipal level.
- **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.
- **John K. Bartow, Jr., New York State Tug Hill Commission:** Problem statement needs to be stated more clearly; nonpoint source pollution needs to be coordinated from the

bottom up; increase assistance to local governments to manage pollution sources; emphasize \$188.7 million, not \$77 million for wetland restoration; eighteen million dollars for ten watersheds is inadequate.

- **Brian Smith, Citizens Campaign for the Environment:** Increase wetlands restoration; create a separate goal for wetlands restoration to abate non-point source pollution; strategy should recommend wetland restoration of an additional 550,000 acres short term and one million acres long term for non-point sources.
- **St. Clair River Binational Public Advisory Council:** Recommended funding is short of needs, partnering with other fund sources will be necessary.
- **Charlotte J. Read:** Wetlands declared isolated and not protected under federal law must be protected.
- **Concerned Groups' Collective Comment on Great Lakes Regional Collaboration Draft Plan (Also submitted separately by Tip of the Mitt Watershed Council):** 550,000-acre recommendation and longer-term recommendation should be above and beyond the recommendation in the Habitat/Species section; reword the interim milestone; provide better protection of "isolated wetlands,;" section should recommend that coordinating agencies be charged with identifying priority watersheds and planning buffer strips; improve funding and regulatory program for indirect pollution sources; apply a whole-watershed approach to soil conservation; integrate the Hydrological Restoration of Ten Great Lakes Tributaries and soil conservation recommendations with the Habitat/Species section.
- **City of Waukegan:** Recommendation five unclear; use a better approach to prevent significant hydrological alteration requiring a specific allowable release rate based on the increased impermeability of a site.
- **Gerald F. DePerry, Great Lakes Indian Fish and Wildlife Commission:** Place higher emphasis on the protection of high quality watersheds in the upper Great Lakes; mention that logging (as a form of agriculture) can have serious impacts on watersheds and sediment loads; emphasize sustainable forestry techniques.
- **EPA Region Five Waste Pesticides and Toxics Division:** Better identify connections between coastal health and nonpoint source recommendations 1 and 5; provide a reference to page 30 statement that "funding to increase point source control beyond 90 or 95 percent is less effective than providing the same amount of funding to address nonpoint sources.
- **John A. Andersen, Jr., The Nature Conservancy:** Additional areas should be identified as priority areas for protecting and restoring wetlands, creating buffer strips and residue management, and protecting and restoring hydrologic regimes; recommendation #5 should be coordinated with Habitat/Species Strategy Team recommendation and goal on Riverine Habitats.

- **George H. Kuper, Council of Great Lakes Industries:** Design NPS control programs and reduction goals on established best management practices that include attainable and meaningful performance targets; targets described in recommendations 1-3 regarding wetland and buffer restoration or protection appear arbitrary; include flood control, power generation, navigation, and other uses of waterways when considering river flow control systems (dams).
- **Richard D. Swenson, Animal Husbandry and Clean Water Division, USDA/Natural Resources Conservation Service:** If statement that "total input of stressors from nonpoint source pollution today considerably exceeds that from point sources" should be documented; goals will be difficult to achieve in a short time frame; give more consideration to non-agricultural areas contributing to nonpoint sources of pollution; discuss air borne pollutants as a nonpoint source in section three.
- **David Jacobs, Department of Housing and Urban Development:** Strategy should include green roofs in the general definition of buffer strips as an urban strategy for non-point source pollution.
- **Robert D. Hoffman, Ducks Unlimited:** 550,000-acre recommendation in the Non-point Source section should be above and beyond the recommendation in the Habitat section; draft plan should strongly advocate a new policy to protect "isolated" wetlands lost due to SWANCC court decision; modify current wetland regulations designed to encourage and facilitate wetlands restoration and rehabilitation; reevaluate regulatory review process.
- **Wayne Howard, Rochester Regional Group of the Sierra Club:** Include Lake Ontario in the "Critical Geographies" listed in the report; despite USDA matching funds, funding is the primary issue for phosphorous abatement as most farmers cannot afford initial funding.
- **Gildo Tori, Ducks Unlimited:** Provide incentives for farmers and landowners to reduce nonpoint source pollution; all Great Lakes partners should support a strong Conservation Title in the Farm Bill.
- **Chuck Hersey, Southeast Michigan Council of Governments:** Strategy should emphasize the critical role of citizens in protecting the lakes through every day actions.
- **Peggy B. Johnson:** Place greater emphasis on pollution prevention by integrating storm water management in newly developing areas.
- **Thomas R. Anderson, Save the Dunes Council:** Place a greater emphasis on protecting existing wetlands.
- **Kenneth W. Fallows, Mayor, Village of Haskins, Chair, Toledo Metropolitan Area Council of Governments:** Since lack of current data is a potential roadblock for funding from current programs, funding for TMDL monitoring should be significantly increased, or EPA should re-think data requirements for implementation.

- **Carol Cook, Save the Dunes Conservation Fund:** Recommend \$200 million annually to restore 550,000 acres of wetlands, \$350 million for the restoration of 335,000 acres of buffers over five years; \$150 million to receive a 40% reduction in soil loss in selected watersheds, \$110 million in funding to provide support in developing and implementing a comprehensive nutrient and manure management of livestock farms and confined animal feeding operations; \$30 million to provide essential hydrological modifications for watersheds of various sizes.
- **John Beeker, Ph.D., Northeast Ohio Areawide Coordinating Agency:** Funds to underwrite costs of conservation of critical riparian resources are much needed.
- **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.
- **Water Environment Federation:** In its comments, the WEF indicates the goals it supports.
- **Amanda Bosak:** It is important to mention the impact of lawn fertilization.
- **Izaak Walton League of America:** Suggest restoration of wetlands and creation of buffer strip to reduce non-point sources; we support watershed management; we support restoring the pre-SWANCC Clean Water Act protections of isolated wetlands.
- **Bill Caines:** The report does an inadequate job of addressing non-agricultural sources of phosphorous, such as soaps and home fertilizer use.
- **Sharon Duerkop:** I think the elephant in the room on this one is urban impacts.
- **Bird Vincent:** This section has the wrong goal, instead of adding acres of filter strips we should be adding acres of ditches.
- **Housing and Urban Development:** On page 33, recommendation recommends education and installation of buffers in urban and suburban environments; we believe the strategy should include green roofs in the general definition of buffer strips as an urban strategy for nonpoint source pollution.
- **Great Lakes Indian Fish and Wildlife Commission:** More emphasis needs to be put on the protection of high quality watersheds in the Great Lakes.
- **Great Lakes Water Institute:** The goals and milestones focus primarily on runoff sources without mention of atmospheric deposition; should specify nutrients, contaminants and pathogens of concern- in report as well as appendix; should include mention of phosphorous from fertilizers.
- **Macomb County Environmental Prosecutor (and Others):** The failure to address airborne pollution is a serious flaw in the plan.