



June 4, 2004

Admiral James D. Watkins, U.S. Navy (Retired)  
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*Governor of Minnesota*

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*Governor of Pennsylvania*

DAVID NAFTZGER  
*Executive Director*

Dear Admiral Watkins:

The Great Lakes Governors thank you for the opportunity to comment on the April 2004 Governors' draft of the *Preliminary Report of the U.S. Commission on Ocean Policy (Preliminary Report)*. I am pleased to submit these comments on behalf of the Council of Great Lakes Governors in addition to the more detailed comments being submitted by our member Governors. The importance of protecting our coastline and waters cannot be minimized. We applaud the recognition that has been given to our collective efforts and the call for further, coordinated action.

The waters in the Great Lakes represent approximately 20% of the world's surface freshwater and approximately 95% of North America's. Recognized in law as America's fourth sea coast, the Great Lakes have over 10,000 miles of coastline and provide water for the region's 40 million citizens. Understanding the importance of this shared resource, two decades ago our States jointly formed the Council of Great Lakes Governors. In part, the Council was created to fulfill our lead responsibilities as stewards of the Great Lakes Basin's water resources and in recognition of the tremendous ecological, economic and social benefits they provide.

The Great Lakes Governors remain committed to protecting and restoring the natural habitat and water quality of the Great Lakes Basin; preserving diverse and thriving plant and animal communities; protecting the water supply; and, safeguarding human health. To that end, the Great Lakes region has taken great strides in creating the scientific and governance framework for addressing the numerous threats to the Great Lakes. We therefore applaud the Ocean Commission's recognition that problems are often regional in nature, and that it is the regions' leaders that must be looked to when formulating policies to protect, preserve, restore and improve resources like the Great Lakes. We also applaud the long-overdue call for a more robust federal investment toward these objectives.

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Fundamentally, we believe that ocean policy should be guided by the following principles:

- minimal bureaucracy, allowing efforts to be directed toward protection and restoration rather than toward process and paperwork;
- affordable non-federal match requirements, particularly in light of ongoing and significant State investments;
- coordination of the efforts of the many government and non-governmental entities involved in protection and restoration activities; and,
- recognition of the leadership role of the Great Lakes Governors in defining regional priorities.

We encourage the Ocean Commission to recognize these important themes as a final report is developed.

### **Common Challenges Facing the Oceans and the Great Lakes**

Many common challenges currently face the oceans and the Great Lakes and this is recognized in the *Preliminary Report*. From the need for more robust coastal protection mechanisms, greater investment and improved research, much can be accomplished through a national ocean policy framework. We certainly recognize the need for more federal resources to address these issues in the Great Lakes and support mechanisms to make these funds available. As you know, members of Congress recently introduced legislation that would devote \$4-6 billion more to Great Lakes restoration and protection. We applaud this legislation and other means to make funds immediately available.

The recent report from the General Accounting Office illustrated that the States are already making significant investments toward restoring and protecting the Great Lakes. These State resources exceed those being committed by the federal government. In this respect, it is important to recognize that greater federal investment will supplement, not supplant, the significant resources already being committed by the States, municipalities and private sector.

We support the Commission's call for a strengthening of scientific understanding and research for our ocean and freshwater resources. Without a significant investment in research and data collection, we will not have in place the appropriate decision support mechanisms that policymakers including the Great Lakes Governors need. The *Preliminary Report* calls for doubling the federal investment in research and this is a useful starting point.

While more research is clearly needed, substantial long-term funding is needed immediately to address the restoration and protection needs we already understand well. For example, much more must be done and done immediately to combat the scourge of aquatic invasive species. This can only be accomplished with added financial support from the federal government. Measures such as making the Chicago Ship and Sanitary Canal dispersal barrier permanent must be prioritized in order to thwart the introduction of the Asian carp and other invasive species.

In October, I joined with my fellow Great Lakes Governors in outlining nine priorities for Great Lakes restoration and protection. Many, if not all, of these priorities address challenges common to the oceans. These priorities should be given primary consideration in framing both short and longer-term federal investments in the context of ocean policy:

- Ensure the sustainable use of our water resources while confirming that the States retain authority over water use and diversions of Great Lakes waters.
- Promote programs to protect human health against adverse effects of pollution in the Great Lakes ecosystem.
- Control pollution from diffuse sources into water, land and air.
- Continue to reduce the introduction of persistent bioaccumulative toxics into the Great Lakes ecosystem.
- Stop the introduction and spread of non-native aquatic invasive species.
- Enhance fish and wildlife by restoring and protecting coastal wetlands, fish and wildlife habitats.
- Restore to environmental health the Areas of Concern identified by the International Joint Commission as needing remediation.
- Standardize and enhance the methods by which information is collected, recorded and shared within the region.
- Adopt sustainable use practices that protect environmental resources and may enhance the recreational and commercial value of our Great Lakes.

### **Unique Challenges Facing the Great Lakes**

The *Preliminary Report* recognizes the Great Lakes as one of the regions to be addressed in a national ocean policy framework. But, the *Preliminary Report* fails in many instances to recognize the unique challenges facing our region and the prominence these challenges demand in the final report. For example, the Great Lakes are not mentioned in the Executive Summary of the *Preliminary Report*. Further, references are made throughout the *Report* to “ocean, coastal and marine” resources and issues. Our freshwater resources and, in particular, the Great Lakes must also be recognized where appropriate. Where issues in the report are meant to solely refer to oceans, separate consideration must be given to the Great Lakes.

It must be recognized that managing our oceans and salt water resources present many different challenges when compared to managing the Great Lakes. A ‘one size fits all’ approach is not appropriate. This is particularly clear when considering that the Great Lakes, unlike the oceans, serve as an important source of water for drinking, for industry and for agriculture.

For this reason, the Ocean Commission must develop recommendations that fully utilize existing water resource management institutions. In the Great Lakes region, this is particularly important as we enjoy a rich institutional and governance structure that has evolved over many years of cooperation and collaboration.

Future policies must be State and region-based, enlist partnerships at all levels within and outside of government and place an emphasis on strong Federal/State relationships.

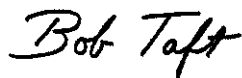
Further, the Great Lakes Governors have concerns about creating additional regional organizations that may, in effect, compete with the numerous institutions already in place.

**Conclusion**

We welcome the opportunity to join you in building momentum for this historic policy initiative. We believe progress toward our shared goals is essential to the environmental health and economic vitality of our nation. We continue to engage the public in our dialogue and appreciate the opportunity to participate in this discussion with you.

We look forward to building on the partnership among the region's Governors, Members of Congress, Mayors and others committed to the protection and restoration of our ocean and freshwater resources. Thank you for your continued engagement and perseverance. Should there be questions, please do not hesitate to contact David Naftzger, Executive Director of the Council of Great Lakes Governors, at (312) 407-0177.

Sincerely,

A handwritten signature in black ink that reads "Bob Taft". The signature is written in a cursive, slightly slanted style.

Bob Taft  
Governor, State of Ohio  
Chair, Council of Great Lakes Governors