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U.S. Commission on Ocean Policy
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Members of the U.S. Commission on Ocean Policy:

Thank you for the opportunity to comment on the Governor's draft of the *Preliminary Report of the U.S. Commission on Ocean Policy*. The report advances the important task of protecting our coastline and waters, and the State of Illinois stands ready to work with you and others to protect our oceans and freshwater resources. We provide the following comments, which in part reinforce those made by Governor Taft in his capacity as the Council of Great Lakes Governors Chair.

1. Provide Additional Guidance on Great Lakes Policy

There are many common challenges facing the oceans and the Great Lakes. Therefore, it is appropriate for the *Preliminary Report* to address both. However, the report appears to overlook the Great Lakes. The report also appears not to recognize the unique challenges facing our region. For example, unlike the oceans, the Great Lakes are a vast source of water for drinking, industry and for agriculture.

The Great Lakes also require priority attention. Despite improvements that have been made in the past forty years, problems remain that threaten recovery of the Great Lakes ecosystem. For example, beaches are closed due to bacteria, pollution has made some fish unsafe to eat, and 20 percent of the Great Lakes shoreline remains polluted with toxic sediments. Invasive species pose perhaps the most serious threat to the Great Lakes in a century. 140 invasive species threaten to decimate native plants and animals that are integral to the ecological and economic health of the Lakes, with more arriving each year. The Asian Carp, for example, is swimming toward Lake Michigan and, unless stopped, threatens to cripple the \$4 billion per year Great Lakes fishery.

For these reasons and more, the Great Lakes command a higher level of attention in the *Preliminary Report* and the Report must set forth more clearly to what degree the recommendations offered may apply to Great Lakes coastal areas.

2. Recommend Substantial Long-Term Funding for the Great Lakes

The Commission proposes a dedicated Ocean Policy Trust Fund that would be funded at \$1.2 billion and increasing over time to a sustained \$3.2 billion. The Outer Continental Shelf oil and gas leases are the identified source of revenue to capitalize the fund. We applaud this recommendation but urge the Commission to clarify that a significant portion of these funds should be available to activities within the Great Lakes.

Indeed, a recent report from the General Accounting Office demonstrates that states already expend more resources on Great Lakes restoration and protection than the federal government. Substantial new federal funding is needed to address “ready-to-go” projects as well as long-term planning and programs. For example, federal funding is needed to fund the construction and maintenance of a second permanent invasive species barrier on the Chicago Sanitary and Shipping Canal. The Army Corps of Engineers is planning to construct one permanent barrier, but a double barrier system is needed to block Asian Carp from entering Lake Michigan and to prevent the migration of other invasive species.

3. Comments on specific recommendations

Of the *Preliminary Report*'s many recommendations, some stand out as being especially commendable. These include recommendations that USEPA develop strategies to:

- Enhance sediment management
- Evaluate transport of contaminated sediments
- Require advanced nutrient removal from wastewater discharges,
- Help communities improve design, operation and maintenance of septic and other on-site disposal systems
- Reducing ag waste impacts
- Increase infrastructure funding
- Develop water quality trading
- Enhance land use planning to reduce water quality impacts

However, we are concerned about the recommendation to create “financial disincentives and enforceable measures” upon states that fall short of “meaningful progress” toward meeting water quality standards. There are limited regulatory tools to control non-point source pollution. Moreover, water quality often recovers at a slow pace. How will that be measured? What is reasonable progress? It is important that states are not held accountable for unachievable measures. We are also concerned with the recommendation that the Clean Water Act Section 319 non-point source grant program be merged with the Coastal Zone Act non-point source program.

4. Priorities and Principles

We join Governor Taft in urging the Commission to frame its recommendations in the context of the nine priorities for Great Lakes restoration and protection that have identified by the Council of Great Lakes Governors:

- 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.

Moreover, we believe that your recommendations 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.

Thank you again for your taking into consideration our comments.



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