

Lake Erie Protection & Restoration Plan 2020 – Public Comment Response Summary

March, 2020

Priority Area	Comment	Response/Recommendation
Nutrient Pollution	Does the Lake Erie Commission only monitor whether its objectives are being met or does it get involved in projects in the H2Ohio initiative if there are specific projects if there is concern that the project is contrary to some of the commission's objectives?	The Ohio Lake Erie Commission works collaboratively with our Commission state agencies to identify, track and report progress of the LEPR objectives. The state agencies that are administering H2Ohio (Ohio EPA, ODA, ODNR) are all Commission member agencies, and the Ohio Lake Erie Commission is coordinating H2Ohio activities as they relate to Lake Erie nutrient reduction. Specific projects will be selected and administered by the respective state agency under the H2Ohio Initiative. These individual projects will not be specifically listed in the LEPR, but more information about them will be available through each agency and on the h2.ohio.gov web site.
All	What are the mechanisms for this commission to meet its objectives like addressing AOC?	The Commission will be utilizing the five activities identified in the LEPR to meet these objectives. Further, the Commission will be identifying measures of progress mechanisms as a next step identified on pg 29 of the Plan.

All	<p>Quantifiable Goals. Most of the goals and objectives in the plan are qualitative, not quantitative. Thus, it will be hard to measure the plan's success. For example, the goal about habitat and species talks about supporting, enhancing, or increasing habitat in general terms, but there are no science-based targets (such as number of wetland acres, measures of overall wetland function, measure of diversity or connectivity, etc.). The plan should have such specific, measurable goals to assure accountability and to inspire progress. What will it really take to restore the lake to ecological health? I realize that the science of this is often difficult, but the plan can do much better.</p>	<p>The Commission will be identifying measures of progress mechanisms as a next step identified on pg 29 of the Plan. This will be an action by the Commission once this general plan is approved.</p>
Adaptation & Resiliency	<p>Climate change. Incredibly, the plan does not directly address climate change. The rapidly changing climate is already affecting the lake in many ways by altering temperature, patterns of precipitation, ice cover, erosion, and the abundance of plant and animal species. These impacts will likely increase in the coming years. In many ways, climate change is the overarching issue affecting all the other priority areas of the plan. All the areas should address how objectives and activities will need to adapt to the changing climate. This should be a major emphasis of the plan. We must prepare for a very different future -- and a very different Lake Erie. For more information on the serious climate changes we can expect in the Lake Erie basin, see the report the U.S. Forest Service did recently for the Lake Erie Allegheny Partnership for Biodiversity (LEAP): https://www.leapbio.org/biodiversity-plan/climate In response to climate threats, LEAP's Biodiversity Vision calls for much greater habitat protection in core areas and linking corridors. The Lake Erie shoreline is identified as a key habitat corridor where conservation and restoration should be expanded: https://www.leapbio.org/content/2-biodiversity-plan/natural-connections-20190305.pdf</p>	<p>Climate change is an over-arching theme and addressed through consideration of adaptation and resiliency. Adaptation and resiliency activities are identified under each Priority as a primary activity to meet the goals and objectives of the Plan.</p>

Dredge Material Management	The LEPR objective of dredge material management is critical. I have personally attended OhioEPA seminars related to beneficial use of dredged material. We are vested in the success of beneficial reuse programs because without the deep-water channel, the high quality sand and stone we receive would not be available at prices our local economy can support. We encourage the continued dredging of the Lorain Harbor as a great economic benefit to the growth of Lorain County and surrounding areas. We have offered our services to the City of Lorain for assistance regarding finding reuse of the material.	Lorain Harbor continues to be part of the State’s Dredge Material Management program.
Adaptation and Resiliency	The LEPR objective of water infrastructure investments is also vital to our company and will be necessary to reduce erosion, loss of usable land, and sediment accumulation in the rivers. These impacts are accelerating as water levels continue to rise to record levels. We have seen significant erosion on our shorelines. But it costs millions of dollars to engineer, permit and construct shoreline protection. Technical and financial assistance to property owners could mitigate future environmental and economic impacts, but action must be taken quickly.	Adapting and planning for more variable water level regimes is listed under the Habitat, Beaches and Recreational Use Priority. The ODNR Office of Coastal Management program provides guidance and free technical assistance to coastal property owners to address coastal erosion and is also identifying potential high-risk areas that may be impacted by rising water levels.
Jobs, Tourism and Economy	The LEPR objective of promoting economic opportunities that sustain and advance communities and their economic sector assets with Lake Erie relates directly to our company. In order to successfully implement the LEPR, continued engagement with stakeholders will be vital.	The Commission will continue to provide information to stakeholders on the LEPR Plan progress in the coming two years.
Metrics, Stakeholder engagement	Supportive of the general plan and the H2Ohio Initiative and its relationship to LEPR. Supports the establishment of metrics of each priority area and the continuation of a robust stakeholder engagement process as part of the plan. Interest in the involvement with any stakeholder opportunities proposed by OLEC throughout the plan’s development and implementation.	The Commission will continue to maintain regular updates and stakeholder outreach on the Plan and its implementation.
Habitat	We are interested to see how applicable agencies (i.e. OEPA) will be supported to accomplish aspects of this plan like “establishing expanded monitoring of wetlands and habitat improvements”	State agencies work collaboratively on monitoring. Through the H2Ohio initiative and state agencies will continue to identify mechanisms available to expand monitoring if available.

All	<p>We noted several indirect references to climate change and encourage the plan to use straightforward language to recognize the broad impacts that our region is already experiencing. Links are provided to specific climate change documents adopted in northeast Ohio:</p> <ul style="list-style-type: none"> • https://www.leapbio.org/biodiversity-plan/climate • https://www.countyplanning.us/projects/climate-action-plan/ • https://www.sustainablecleveland.org/climate_action 	<p>Climate change is an over-arching theme and addressed through consideration of adaptation and resiliency. Adaptation and resiliency activities are identified under each Priority as a primary activity to meet the goals and objectives of the Plan.</p>
Dredge Material Management	<p>Dredge Material Management: One approach to addressing dredge material is by preventing its entry into harbors and marinas from upstream sources. This could be accomplished through stream restoration and headcut remediation.</p>	<p>The Commission maintains a goal to reduce harbor sedimentation and will continue working with municipalities and local stakeholders to implement projects to reduce harbor sedimentation. These projects among other efforts may include stream restoration and headcut remediation.</p>
Invasive Species	<p>Invasive Species: We are particularly pleased to see specific reference to Hydrilla within this section and the emphasis on education and outreach to landowners, boat users, etc.</p>	
Toxic Pollutants	<p>Toxic Pollutants: Remediation of persistent toxic substances is indeed critical to watershed and stream health. We advocate that emerging pollutants (e.g. microplastics, pharmaceuticals, PFAS, salinization should also receive attention.</p>	<p>The State of Ohio established a statewide PFAS Action Plan for Drinking Water in 2019 as part of its efforts under this Priority. Also, the binational committee for Annex 3 of the Great Lakes Water Quality Agreement which Ohio participates in is assessing nomination criteria for emerging contaminants in the Great Lakes.</p>

All	<p><u>In addition to general comments, below my team suggested a few minor edits:</u></p> <p>p6: left column, 3rd paragraph - "...manages the distribution of money from the Lake Erie Protection Fund; and administers" [not administrators]</p> <p>p7: 3rd paragraph - "...most shallow of the Great Lakes, which..." [add comma], "...is home to a wide diversity of plants, wildlife [delete fish, animals] and habitats."</p> <p>p7: 4th paragraph - "...significant resource opportunities, but..." [add comma]</p> <p>p8: 3rd paragraph - "...and restore Lake Erie and its watershed, as well..." [add comma]</p> <p>p9: 3rd paragraph - "...quality of Lake Erie, but will require..." [add comma]</p> <p>p10: last bullet - "...in the programs, respectively, in the..." [add two commas]</p> <p>p14: 2nd paragraph - "...wetland habitats of both coastal and inland..." [not upland], "...wetlands recovery can have benefits..." [delete toward a degree of the past]</p> <p>p18: 1st paragraph - "...for more desirable species such as sport fish, waterfowl or native plant." [please add native plants]</p>	OLEC has updated these general comments as applicable.
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