

**Comments by Todd Ambs On Behalf of the State of Wisconsin
To the United States Environmental Protection Agency
Regarding the Great Lakes Restoration Initiative
July 21, 2009**

Thanks for the opportunity to speak with you today about the Great Lakes Restoration Initiative (GLRI). I am here today on behalf of Governor Doyle, DNR Secretary Frank, as a member of Wisconsin's Coastal Management Council and on behalf of many staff within the DNR who are working hard to protect our 1100 miles of Great Lakes shoreline and the Great Lakes Basin within which these shores lie.

It is very exciting to be here today. It is a pleasure to see so many good friends and colleagues who collectively have worked so hard for the Great Lakes over the years. I am especially pleased to be here with Gary Gulezian and his colleagues at GLNPO and delighted to be here with Cam Davis in his new, important role with the Obama Administration.

I have spent most of my 30 year professional career working on water and Great Lakes issues. For much of that time, a clear, agreed upon action plan for the Great Lakes, as well as the resources to undertake the implementation of that plan, have been beyond our grasp. Yet today, I believe that both are well within sight and thanks to the leadership of President Obama and his Administration and with the support of Congress, we will soon have the means to make significant strides on these important tasks.

We cannot waste this opportunity. In preparing for my remarks today I reviewed the testimony that Governor Doyle gave regarding the Great Lakes to a Congressional Committee in December of 2007. (See excerpted testimony below in italics) The Governor spoke of the significance of the Great Lakes both from a recreational and quality of life perspective as well as highlighting how the Great Lakes were a true economic driver for the region. The Governor also noted how significant an accomplishment it was to get the Great Lakes Regional Collaboration done. For years we were collectively unable to identify a cogent set of priorities for the Great Lakes Region to entities like Congress. The Collaboration is that clear, concise, blueprint for action. The only thing missing at the time the Governor testified was a commitment of resources from the federal government – a point that he emphasized at the end of his remarks.

The Great Lakes are a treasure of international significance. They contain approximately 20% of the world's surface freshwater, and 95% of North America's. One in three Canadians and one in 10 U.S. residents depend on the Great Lakes for their water. More than 35 million U.S. residents and 8 million Canadians live, work, and recreate in, on or by the waters of the Great Lakes Basin.

The Great Lakes regional economy and, indeed, our nation's depend on the Great Lakes. For example, the Great Lakes provide water for 70 percent of U.S. steel production. The Lakes provide transportation for almost 200 million tons of international and interlake cargo—indeed, the lake carriers can tell you how much transport tonnage they lose for each inch of water lost. Overall, the region generates nearly 30% of our nation's gross domestic product and about 60% of all U.S. manufacturing. Water is also used for hydro-power on both sides of the border.

Restoring and Protecting the Great Lakes

Restoring and protecting water quality in the Great Lakes is a persistent challenge requiring myriad actions across all levels of government. Required actions are not easily isolated, nor should they be, and we must look at water quality in the broader context of our shared efforts to restore and protect the Great Lakes.

About two years ago, we celebrated the promise of an unprecedented strategy to achieve our shared goals. The process was initiated by President Bush and included our regional leaders—Governors, Mayors, Members of Congress and Tribal leaders—as well as non-governmental groups and hundreds of committed citizens. The process united us as never before toward our shared goals of protecting and restoring our nation’s water belt—the Great Lakes. And, it provided a shared vision of near-term steps that could put us on a path toward a restored water belt—a healthy water belt to power our nation’s economy and support a robust environment.

During the past two years, we have made progress toward our shared vision. Yet, the promise of the Great Lakes Regional Collaboration, and the more particular goal of significantly enhanced water quality, remains largely unfulfilled. Independently, and collectively through the Council of Great Lakes Governors, the Governors have urged Congress and the Administration to act and give us the means to better move from vision to a reality. We are disappointed in the lack of follow-through by the federal government.

What a difference two years makes!

You have asked that we comment on how to make the GLRI effective in addressing problems and you want to learn about restoration plans and activities currently being pursued.

Let me start with the latter subject regarding what we are doing here in Wisconsin.

To further develop the recommendations of the Great Lakes Regional Collaboration, Wisconsin developed the Wisconsin Great Lakes Strategy: Restoring and Protecting our Great Lakes. The intent of this strategy is to provide greater specificity for Wisconsin’s restoration and protection needs within the priorities identified in the Regional Collaboration. Many of the recommendations in the Regional Collaboration are necessarily broad to accommodate the differences across five Great Lakes and eight Great Lake states. The Wisconsin strategy refines these broad recommendations to be specific to Wisconsin and Lake Superior and Lake Michigan. The DNR Office of Great Lakes led the development of this strategy while soliciting input and participation from a broad range of involved stakeholders with the interest of making the strategy as reflective of state interests as possible. This strategy serves as the basis for identifying priorities and restoration and protection projects.

I have copies of the newly revised strategy with me today.

Current Great Lakes plans and activities

Plans

- Wisconsin’s strategy builds not only on the Regional Collaboration document but also on the numerous plans that exist to address topics such as wetlands, wildlife and fisheries. All of those plans feed into Wisconsin’s Great Lakes Strategy.

We are continuing to embark on numerous activities that flow from this strategy. Several of those I am including in my comments as bulleted items listed below. They include:

Activities

- Contaminated sites and sediment projects in Superior, Ashland, Green Bay, Marinette, Manitowoc, Sheboygan and Milwaukee to name a few. These include regulatory directed projects and Legacy Act projects.
- TMDL for nutrients and suspended solids – Fox River
- Ballast water permits
- Great Lakes Compact
- Ozaukee County NOAA stimulus project for fish passage on the Milwaukee River
- Wetland restorations

Priorities related to Great Lakes restoration

The Wisconsin strategy uses eight priorities identified by the Great Lakes Governors including: habitat and species, nonpoint pollution, coastal health, persistent bioaccumulative toxins, Areas of Concern and contaminated sediment, invasive species, sustainability, and information and indicators. For example the strategy identifies actions needed to:

- Protect and restore wetlands (habitat and species, nonpoint, coastal health)
- Decrease beach closures (beach health)
- Restore lake trout (habitat and species)
- Clean up Areas of Concern (AOC's and contaminated sediment)
- Develop a ballast water permitting program (aquatic invasive species)
- Identify other vectors for aquatic invasive species to enter the Great Lakes
- Eliminate mercury in the environment (persistent bioaccumulative toxins)
- Identify and eliminate emerging persistent bioaccumulative toxins
- Control soil erosion and delivery of pollutants to streams (non-point pollution)
- Increase stream buffers (non-point pollution)
- Support implementation of nutrient management on livestock farms
- Ballast water treatment
- Education programs to eliminate other sources of aquatic invasive species introductions
- Lake Michigan and Lake Superior Basin tributary restoration projects in key locations for projects such as:
 - Dam removals
 - Fish passages
 - Wetland protection through acquisition or easement purchase
 - Wetland restoration
- Sediment remediation and habitat improvement projects in all Areas of Concern, and other locations in the Great Lakes Basin
 - Milwaukee River/Harbor
 - Sheboygan River/Harbor
 - Fox River/Green Bay
 - Menominee River
 - St. Louis River and Harbor
- Promote forested land cover in Lake Superior and Lake Michigan Basin to decrease runoff, where appropriate.

- Projects to reduce mercury delivery to the Great Lakes
- Education programs and other efforts to improve road maintenance and proper culvert sizing to improve fish and other species passage and reduce erosion
- Assessing nearshore water quality and status of coastal wetlands

In short, we have not waited for action from the Federal government. We have been plowing ahead with many projects under this strategy. Some examples include:

- An excellent and exciting partnership with the U.S. Fish and Wildlife Service as we together have taken on wetland protection and restoration. In these two years, we together with our other partners have been able to direct damage assessment funds to protect and restore over 10,000 acres of wetlands in the Lake Michigan basin.
- We have expanded the collaborative efforts to also begin a wetland restoration project in the Milwaukee River basin with the combined efforts of federal and State agencies, local governments and private organizations.
- In Green Bay, we have joined with local governments and the dental trade association to provide cost-share incentives to accelerate installation of mercury separators and reduce the potential for mercury entry into the Lake Michigan food chains.
- To increase Conservation Reserve Enhancement Program enrollments into riparian buffer programs, we met with the other State, federal and local agencies and, based on the tributary restoration goals of the Strategy, developed a shared initiative to protect our Lake Michigan tributaries. This initiative has resulted in miles of shoreline protection that will help reduce pollutants and increase habitat quality for Lake Michigan.
- Many other examples too numerous to mention.

We will have much more detailed comments to you after we have had the chance to fully assess the *Draft Great Lakes Multi-Year Restoration Action Plan* that was released just this past Friday.

Let me offer a few initial observations though.

For the Great Lakes Restoration Initiative to be most successful:

- Wisconsin funded activities should help implement the GLRC's goals via the [Wisconsin Great Lakes Strategy: Restoring and Protecting our Great Lakes](#)
- To the greatest extent possible, funding should be "bundled" into large grants that the States can compete for so that monies can be centrally managed and directed to the various agencies and entities receiving funding within the State. This approach will improve accountability and help ensure that State spending is consistent with the GLRC strategy and [Wisconsin Great Lakes Strategy: Restoring and Protecting our Great Lakes](#)
- Affordable non-federal match requirements, particularly in light of ongoing and significant investments by States, other governments and stakeholders in Wisconsin's Great Lakes restoration.
- Provide administrative support. State capacity for successful grants management

Overall, we agree with the five focus areas. As noted by Gary, they match up well with the priorities in the Collaboration. Those five areas again are:

- Toxic Substances and Areas of Concern
- Invasive Species
- Nearshore Health and Nonpoint Source Pollution
- Habitat and Wildlife Protection and Restoration
- Accountability, Monitoring, Evaluation, Communication, and Partnerships

Of all the items listed above I believe that the most important area may well be in the setting of goals, objectives and targets to track progress. Accountability, monitoring and evaluation are key concepts and very much need to be done. In my many years of experience in state government I have seen little evidence that we do a very good job of actually monitoring and evaluating what we are doing, especially with sums of money this large.

But we also must make sure that we don't set unrealistic expectations that set us up for failure.

We should start with good data as a baseline.

You can't know where you are going if you don't know where you are.

I also firmly believe that for the first few years we should have a strong bias toward measuring outputs, not outcomes. Let me offer a couple of examples of what I mean.

With the possible exception of the devastating impacts of aquatic invasive species, I would argue that the most significant water quality issue that we face in the Great Lakes Basin comes from nonpoint pollution. The reason for that is in the name. Nonpoint pollution does not come from any one place and as a result is very hard to manage, control and reduce.

We need to attack nonpoint pollution aggressively but we should set benchmarks that meaningfully track our progress. We know that if we use buffers for instance, in critical watersheds and along critical waterways within the Basin that we will have a very positive impact on water quality. We should set targets for the amount of buffers, track the progress in terms of miles built, and hold ourselves accountable if we miss those goals.

But if we set a goal of a specific percentage reduction in total suspended solids into the lakes by 2014, we will likely fail. We simply won't know those types of outcomes in that short of a time frame. The ability to measure in this way is limited and the variations in results are great.

Once again my point -- expect results but expect realistic results.

Another example is in the area of toxic substances. By and large we know where the contaminated sediments are in the Basin and we can measure the amounts that we remove. We should set those targets and reach those goals. But we could remove all of the PCB's in the Basin tomorrow and not see a reduction in the amount of PCB's in fish tissue for many, many years. Setting an outcome like that for 2014 would set us up for failure because it is an unrealistic result.

We also must make sure that data sets are consistent across the Basin. Our ability to compare apples to apples is a key to meaningfully tracking progress.

We also need to develop meaningful feedback loops with partners like the states throughout the five years of the plan. I know that this is important but I also know that I am not quite sure what works best. I do know that as someone who attends numerous meetings of a myriad of entities that all work on Great Lakes issues, that I have a strong preference to work through existing institutions rather than creating yet another group.

Perhaps this feedback could be gathered through the Binational Executive Committee (BEC). Maybe the Council of Great Lakes Governors could play that facilitation role. Whatever the vehicle we must make sure that this effort is adaptively managed over the next five years and that we don't find ourselves just responding to RFP's periodically without lots of input as those RFP's are developed.

Again, these are just a sample of some of our thoughts at this juncture. We will submit more detailed written comments prior to your August 19th deadline.

As many in this room know, I am a Great Lakes boy. I was born in Michigan, spent 12 years in Ohio and have been in the great state of Wisconsin for nearly 15 years now. I am proud to say that I have swum, fished and paddled on all five of the Great Lakes. And I am thrilled by the prospect of seeing new, meaningful resources brought to bear on protecting and restoring what I like to call the Water Belt of North America – our Great Lakes.

Thanks