

## Agenda for Lake Erie – Policy Briefs

### Why the Agenda is Necessary and How the Agenda will be Used

Water and its safe supply are critical regional issues affecting public health and economic development. TMACOG members will differ on specifics of how goals related to water and its use will be accomplished, but they share many positions. The Agenda for Lake Erie serves as a guidepost for decision-making in those areas where members share a broad consensus.

An Agenda is a necessary tool for day-to-day activities and for strategic decision-making. When fundamental principles have been reviewed and agreed upon, TMACOG members can speak effectively with a unified voice in a timely manner.

TMACOG will use the Agenda to guide day-to-day activities, public information content, and legislative outreach. The Agenda will be codified as a section of the 208 Plan (the Areawide Water Quality Management Plan) and modified, reviewed, and approved using the same process as is applied to the rest of the 208 Plan.

#### Day-to-Day

- Letters of support
- Committee agendas (program event content)
- Program development (formation of projects or committees)

Decisions on day-to-day activities are made by staff and participating members and approved at the council and committee level.

#### Public Information

- Requests for comment from media
- Press releases, newsletters, social media, blogs

Public information materials are produced in consultation with relevant council and committee chairs when possible, or shared promptly.

#### Legislation and Regulation

- Providing formal comments on proposed rules and regulations
- Official resolutions stating policy on a major issue
- Lobbying legislators or regulatory agencies for action

Regulatory comments are created by leadership of councils and committees with approval of Board of Trustees on major issues.

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### Organizing Principles of the Agenda on Lake Erie

The Agenda for Lake Erie is based on principles that are shared by TMACOG members and which members feel need to be embraced and supported to ensure the constant improvement and protection of our supply of fresh water in our rivers and lakes. TMACOG members are guided by the following established principles which address their concerns from national, state, and regional and local viewpoints. These principles inform the specific strategies described on the following pages.

#### BI-NATIONAL, FEDERAL & STATE

**TMACOG supports policies and practices that will make meaningful progress toward meeting the Great Lakes Water Quality Agreement Annex IV targets by reducing phosphorus loadings into the western basin of Lake Erie by 40 percent by 2025.**

Regulatory tools that will assist this progress include the Clean Water Act and the Federal Farm Bill. TMACOG recognizes these programs as essential statements of national priorities and sources of valuable funding for local initiatives.

The goal of the Clean Water Act is to restore and maintain the chemical, physical, and biological integrity of the Nation's waters. The Act establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters.

The 2014 Federal Farm Bill offers financial assistance, voluntary conservation incentives, and partnerships to farmers. TMACOG and its members support continued funding for these programs and amendments to the Farm Bill that would expand support for programs to meet the Annex IV targets for the western Lake Erie basin. See the Agricultural Policies sheet of this Agenda.

TMACOG supports and implements policies and practices that help to meet Ohio's qualitative water quality standards under the Ohio Administrative Code, or the six "free-froms."

- Free from suspended solids or other substances that enter the waters as a result of human activity.
- Free from floating debris, oil, scum, and other floating materials entering the waters as a result of human activity.
- Free from materials entering the waters as a result of human activity producing color, odor, or their condition in such a degree as to create a nuisance.
- Free from nutrients entering the waters as a result of human activity in concentrations that create nuisance growths of aquatic weeds and algae.
- Free from public health nuisances associated with raw or poorly treated sewage.

## **LOCAL & REGIONAL**

TMACOG members agree on several principles in which regional knowledge and local history are essential to decision-making.

### **TMACOG supports policies that provide reliable, safe, and plentiful drinking water for the region's 750,000 citizens.**

Safe, reliable drinking water supply is a special concern for people taking water from the western Lake Erie basin. While water supply for industry, for recreation, and for tourism are also essential, a loss of drinking water would cause immediate and devastating impact on the local inhabitants.

### **TMACOG recognizes the important services provided by our region's natural environment.**

Northwest Ohio's natural environment includes plentiful fresh water in ponds, creeks, rivers, and lakes; wetlands that filter stormwater and protect coastlands; one of the world's greatest freshwater fisheries; and unique soils and plant life that create rare and treasured habitat. We recognize that maintaining and restoring natural features is a cost-effective and robust strategy for protecting natural resources and the water quality of Lake Erie.

### **TMACOG supports the sustainable disposal and beneficial reuse of dredged materials from the Toledo Harbor.**

Recognizing that dredging is essential to the continued operation of the local harbor, and understanding that the shallow western Lake Erie basin is particularly vulnerable to sediment contamination, TMACOG members have long supported innovative reuse dredged materials.

### **TMACOG supports the use of the 208 Plan (Areawide Water Quality Management Plan) as a central organizing tool that governments use to coordinate wastewater treatment plans.**

Through the everyday business of sewage treatment and wastewater management, regional governments have sustained an efficient and cost-effective system that creates clean water and protects public health. Adequate funding should continue to support this valuable program.

### **TMACOG supports measures to prevent the spread of invasive species in Lake Erie and its watersheds.**

Invasive species from ship ballasts or from migration have potential to cause devastating changes to the ecology of Lake Erie. Legislative and physical measures are required to address these threats.

### **TMACOG supports policies that will enable local jurisdictions to be more resilient to the increased frequency and intensity of flood events.**

Increased pavement and use of other impermeable surfaces and increased storm activity due to climate change require proactive stormwater management planning.

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### Impairment and the Clean Water Act

The issue of “Impairment” has garnered much discussion among state and federal regulators and local decision-makers. Among TMACOG’s diverse membership there are many differing opinions on whether or not the western basin should be declared impaired under the Clean Water Act and what that would mean. Some worry that an impairment designation would be a black eye on the face of the tourism industry, others argue that a federal impairment designation is necessary to bring technical and monetary resources to the watershed that will help address the algae problem. The following discussion and policy recommendations aim to broaden the understanding of *Impairment* so that members can be informed when answering questions from their constituents on the issue.

The Clean Water Act requires states to define water quality standards and compile data and information to assess the conditions of waterways within their borders. States need to report the status of waterbodies and identify waterbodies that do not meet water quality standards set by the state. Through an “Integrated Report”, every two years each state reports to U.S. EPA its Section 303(d) list of waterbodies it has designated as “impaired”. States then must conduct additional detailed assessments on impaired waterbodies to determine current levels of pollutant loads and determine the maximum pollutant load that a waterbody can sustain while still meeting water quality standards. This process leads to pollutant load reduction requirements set out in Total Maximum Daily Load (TMDL) reports, which limit pollutant discharge for point sources and guides watershed restoration actions to address non-point sources of pollutants.

#### Impairment According to Ohio and Michigan

U.S. EPA gives authority to state agencies like the Ohio Environmental Protection Agency (OEPA) and Michigan Department of Environmental Quality (MDEQ) to define water quality standards and come up with a plan for making water quality improvements.

Using the authority granted to states under the Federal Clean Water Act, the Ohio EPA has determined that if rivers and streams in Ohio meet four primary beneficial uses, the waterbody is in attainment of water quality standards and no impairment exists. These uses include:

- *Aquatic Life*: measured by the waterbody’s ability to support healthy fish and macroinvertebrate communities
- *Human Health*: measured by the level of contaminants found in the tissues of fish people use for food
- *Recreation*: measured by a waterbody’s safety for swimming, boating and other recreation involving contact with water
- *Public Drinking Water*: measured by a waterbody’s ability to provide safe drinking water with conventional treatment methods

According to the Ohio EPA’s 2016 Integrated Report to U.S. EPA, many of the watersheds draining to the western basin are impaired for at least one beneficial use. Ohio EPA also designated the Lake Erie western basin shoreline and the open waters surrounding Toledo and Oregon municipal water intakes as impaired for all four beneficial uses. Michigan DEQ has also assigned an impaired designation to Michigan waters of Lake Erie. However, Ohio EPA is currently withholding the impairment designation from the open waters of Lake Erie. The Ohio EPA is looking to U.S. EPA to lead the effort to establish science-based standards, monitoring, and assessment protocols for the open waters of Lake Erie.

With or without an impairment designation for the western basin of Lake Erie, TMACOG members recognize that much needs to be done at the local, state, and federal levels to combat the algae problem

and the other problems plaguing our region's most important natural resource – Lake Erie. The following pages lay out policy and funding recommendations that will help to ensure that current and future generations can utilize Lake Erie and its tributaries for fishing, swimming, drinking, and a healthy tourism industry.

### **Policy Recommendations**

- To meet requirements under the Clean Water Act, TMACOG recommends that the U.S. EPA and the Great Lakes National Program Office (GLNPO) work collaboratively with the designated agencies of WLEB states – Ohio EPA, Michigan DEQ, and Indiana Office of Water Quality – to determine science-based standards, monitoring, and assessment protocols that can be used to determine impairment status for the four beneficial uses – aquatic life, human health, recreation, and public water supply – in the open waters of Lake Erie's western basin.
- Using standards and protocols set through collaboration with U.S. EPA and GLNPO, Ohio EPA, Michigan DEQ, and Indiana Office of Water Quality should collaboratively assess and report the impairment status of the western Lake Erie basin beneficial uses.
- If U.S. EPA and state agencies determine that impairment status requires the development of a Total Maximum Daily Load (TMDL) report for the western Lake Erie basin, agencies should work within existing state TMDL processes for watersheds to update pollutant load allocations for both point source discharges and non-point sources for individual watersheds within the western Lake Erie basin. These load allocations should be used to set pollutant load limits for regulated point source dischargers and specify non-point source load reduction targets for all land uses in the western Lake Erie basin.
- U.S. EPA should dedicate ongoing funding to state agencies to offset the costs of the substantial staffing requirements for standards development, monitoring, analysis, and reporting related to the western Lake Erie Basin.
- For the nearshore areas of Lake Erie, OEPA should evaluate and revise its evaluation criteria to include algal toxin criteria in addition to the current *E. coli* criteria.

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### Stormwater Management

Urban stormwater runoff is generated from rainfall and snowmelt as it flows over land and impervious surfaces directly into our local waterways and Lake Erie. As it moves, runoff picks up trash, chemicals, sediment, oils, nutrients, and other pollutants. Increasing impervious area increases pollution and it also increases the volume and velocity of stormwater entering waterways, leading to stream bank erosion, sediment transport, and deposition. Stormwater runoff directly impacts aquatic communities and the beneficial uses of rivers, streams, and Lake Erie.

Historically, water pollution control focused on obvious point sources: municipal wastewater treatment plants and industrial discharges that flow from a pipe directly to a water body. Most point source pollutants were addressed through the early focus of the 1972 Clean Water Act. As water quality improved, additional regulations were put in place to address the significant water quality issues caused by runoff from the built environment.

As point source discharges were improved under the National Pollutant Discharge Elimination System (NPDES) permitting program, the impact of non-point source pollutants from urban runoff became apparent. By 1987, the NPDES program was extended to stormwater runoff and included regulation of urban areas. Under these regulations, local governments with municipal separate storm sewer systems (MS4s) must address five main issues with their stormwater management programs – detecting and eliminating illegal discharges to stormwater systems, ensuring that municipal operations and maintenance activities do not contribute to stormwater pollution, regulating runoff from construction sites, preventing long-term stormwater pollution resulting from development, and educating the public on ways they can prevent stormwater pollution. TMACOG members recognize the value of these stormwater regulations. TMACOG governmental members who are regulated under the NPDES MS4 Stormwater Permit recommend improvements and local initiatives to improve the stormwater permitting process and improve regional water quality.

#### TMACOG Recommended Stormwater Policies

##### *Federal and State*

- Encourage federal and state agencies to write stormwater regulations that detail clear expectations for compliance and that contain standards that are enforceable by state and local agencies.
- Under the Ohio Revised Code, counties face many hurdles to inspecting and enforcing required sediment and erosion control measures on construction sites. TMACOG recommends that ORC 307.79 be amended to give incorporated and unincorporated areas equal authority to enforce OEPA regulations required by the Stormwater Permit for MS4s
- Ohio EPA should actively engage regulated MS4s in the entire Stormwater NPDES rule-making process via Early Stakeholder Outreach (ESO) for the MS4 General Permit and the Construction General Permit. Improve the ESO process by providing clear, consistent, and timely notification of the permit drafting process and opportunities for stakeholder involvement. Ohio EPA should also ensure an equitable ESO process that provides ample opportunities for meaningful input across all regulated communities in Ohio.

##### *Regional*

- Promote consistent construction site plan review procedures and sediment and erosion control regulations across TMACOG member jurisdictions.
- Promote regional integration and standardization for stormwater management and green stormwater infrastructure across the TMACOG region
- Local governments should work in partnership with Ohio EPA on the implementation of the Construction General Permit.

##### *Funding*

- Encourage the use of stormwater utilities to fund local stormwater management programs and the installation and long-term maintenance of all stormwater infrastructure.

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### Green Stormwater Infrastructure and Habitat Restoration

Paved property, roofs and other impervious surfaces increase the volume and velocity of runoff during rain events and urban runoff contains a cocktail of pollutants (e.g., sediment, nutrients, metals, organics, and hydrocarbons). Because stormwater is not treated in a wastewater plant, those pollutants run into nearby waterways with the rain or snowmelt. Green stormwater infrastructure (GSI) and the protection of natural drainage systems are tools used to manage stormwater volumes, improve water quality, and control flooding.

GSI emphasizes infiltration, evapotranspiration, or rain water reuse to restore or mimic natural systems. This is often accomplished through the use of plants and soils or engineered solutions that recreate natural processes. Types of GSI include bioswales, rain gardens, green roofs, blue roofs, permeable paving, and subsurface detention systems.

Natural habitats, such as wetlands, riparian buffers, forests, and grasslands act as filters and slow surface runoff and stream flow to mitigate flooding. Significant areas of natural habitat have been lost in our region due to development and conversion to agriculture. Habitat restoration is the process of assisting with the recovery of habitat that has been degraded, damaged, or destroyed.

#### TMACOG Recommended Green Stormwater Infrastructure Policies

##### *Federal and State*

- Ohio EPA should use the Construction General Permit to require stormwater infiltration on all new construction and redevelopment of more than one acre.

##### *Regional*

- Integrate balanced growth and low-impact development principles into the TMACOG long range transportation plan.
- Support public acquisition or establish permanent easement of riparian habitat areas, by voluntary decision of willing property owner, and provide compensation for loss of property.
- Local governments should review and update their community’s codes and ordinances to remove barriers to GSI implementation and protection of wetlands, floodplains, and other natural features that provide stormwater management services.
- Work with local groups (governments, foundations, businesses, non-profits, neighborhoods, etc.) to promote incorporating green infrastructure into landscaping.
- Support watershed-wide collaboration to identify green infrastructure and habitat restoration projects to meet western Lake Erie water quality goals.

##### *Funding*

- Promote the use of stormwater utilities to fund GSI improvements and long-term maintenance.
- Promote wetland mitigation and stormwater banking to offset impacts made through development and land conversion.
- Support funding for watershed-based planning with measurable goals and strategies for GSI and habitat restoration projects that address causes and sources of watershed impairment.
- Support funding for ongoing and regular updates to “9-element” watershed plans to ensure timely planning of GSI and habitat restoration projects.
- Support funding for the implementation of GSI and habitat restoration projects that are recommended in the watershed plans or that advance the goals of water quality improvement plans.

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### Public Water Supply and Wastewater Treatment

Providing abundant, safe drinking water to the general public is one of the primary duties of every municipality. Treating wastewater and returning clean water to the natural environment is also an essential role of governments. TMACOG and its members support the professional staff who create and monitor the systems that provide water delivery and treatment and help them in their work with training and by providing a forum for information-sharing. TMACOG supports policies and funding solutions that increase professional capacity and fund necessary infrastructure.

#### **TMACOG Recommended Policies for Public Water Supply and Wastewater Treatment**

##### *State and Federal*

- Support the development of a nutrient trading project to reduce phosphorus loadings. Local wastewater facilities have invested hundreds of millions of dollars to reduce pollutants reaching Lake Erie through treatment and sewer system improvements. Additional infrastructure investments may yield diminishing returns as projects eliminate ever smaller sources of pollution. It may be more cost-effective for funding to be applied to nonpoint source and habitat projects in the watershed.
- Support the Ohio EPA's Water Resources Restoration Sponsor program that uses Publicly Owned Treatment Works partnerships for clean water.
- Support water trust funds. A water trust could provide a funding source for water infrastructure (water supply, sanitary sewerage, stormwater, green infrastructure and other projects to reduce or address nutrient inputs). A trust would augment the federal water and wastewater State Revolving funds. Any trust fund must include a mechanism to ensure that funds will be used in a timely manner for intended purposes. The funding sources should come from taxes or fees on goods and services related to a clean water issue – e.g., beverage containers, pharmaceuticals, or fertilizers and pesticides.
- Support efforts by individual water systems to prepare Source Water Protection Plans. Pollution sources that affect water supplies often originate in neighboring communities or upstream watersheds —outside the water system's jurisdiction and control. Funding regional efforts is cost-effective and recognizes the regional nature of the problems.
- Fund and support development of training programs that provide continuing education credit for professional engineers, planners, or water/wastewater treatment plant operators.
- All water systems are required to conduct public education and outreach and to publish an annual Consumer Confidence Report, which details chemical analyses. Support the efforts of water system professionals to conduct proactive educational programs to raise the public's understanding of the public water supply and the how the water utility assures its safety.

##### *Regional*

- Promote and support resource sharing between jurisdictions. Operating a water system requires specialized equipment, software, and personnel. Local governments can work together and save money by sharing resources.
- Support the mission of water service providers in the TMACOG region to collaborate to create and maintain an inventory of water supply infrastructure. A system inventory would facilitate emergency water supplies and serve as a resource for asset management planning.

##### *Funding*

- Support state and federal grants and financing for infrastructure addressing water supply treatment and distribution, wastewater treatment, and stormwater management.
- Provide information on financing and rate structuring mechanisms for capital improvements addressing public water supply and distribution, wastewater treatment, and stormwater management.
- Local governments ensure a safe and plentiful water supply through water/wastewater management despite high loadings of phosphorus from the watersheds and microcystin in Maumee Bay and Lake Erie. Recognize this financial burden and support full funding for advanced treatment equipment, personnel, and chemicals.



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### Onsite Sewage Treatment Systems

On-site sewage systems are an important source of dissolved phosphorus, the nutrient that drives the toxic algae blooms in the Western Basin of Lake Erie. On-site sewage treatment systems that comply with today’s standards can be an effective and economical means of treating sewage, but often fall short of that mark. Soil conditions of much of northwest Ohio and southeast Michigan have inadequate drainage, high seasonal or perched water tables, shallow bedrock, or karst bedrock formations. Small communities with high concentrations of on-site sewage systems on small lots form a relatively high concentration of treatment systems. Home systems have a life-span of 25 to 30 years and small lots mean there is not adequate room on the property to install an on-lot replacement system. The small communities often have relatively old housing stock, meaning they are unlikely to have a functioning sewage treatment system that households could connect to.

#### TMACOG Recommended Policies for Onsite Sewage Treatment

##### *Federal and State*

- Recognize as established policy that an occupied structure such as a residence or a business is required to tap into the public sanitary sewer if it is considered “available and accessible.” The reasonable distance for connection requirement default value is 200 feet from the foundation to the sewer under Ohio Revised Code section 6117 though the distance may vary from county to county.
- Recognize the public sanitary sewer system as “best available technology” for sewage treatment. Where sanitary sewers are available and accessible, on-site sewage treatment systems should be abandoned in favor of connecting to the public sewer. New properties should be required to connect to a sewer.
- Discourage legislation that allows individual properties to opt out of the sewer tap requirement. Opt outs challenge the financial viability of a public sewer system and may make extension of the sewer to the area cost-prohibitive to other residents.
- Use the “208” Plan boundaries proactively to inform builders and homeowners of facility planning areas where they may be required to tap into sewers in the future.

##### *Regional*

- TMACOG recommends requiring inspections of septic systems upon transfer of real estate.
- TMACOG supports regulations to require mandatory county health department inspections of septic systems serving residences or businesses and subsequent operating permits. The frequency of the inspection/length of permit should be determined by the county health department based on the components of the system and whether it discharges. An on-site sewage system has a limited lifespan; therefore, inspections should be required to maintain proper operation and to identify necessary repairs to protect the environment and financial interest of the homeowner.
- TMACOG recommends support for educational programs that teach homeowners how to safely maintain a home sewage treatment system.
- Septic tanks or individual household sewage treatment systems should not be permitted for new subdivisions within a facility planning area boundary. New subdivisions should connect to public sewers and be served by the facility planner area’s designated wastewater treatment plant.

##### *Funding*

- The state should provide funding for county health departments to update and digitize information on septic systems. Very few county health departments have current and complete information on septic systems and most records are still on paper. Health departments will need financial assistance to establish complete electronic records of existing systems and utilize computer mapping technology to manage them effectively.

- Restore funding to the sewer Rotary Fund to help pay for sewers in agricultural areas. The purpose is to eliminate existing water quality problems without requiring unserved parcels to pay tap-in fees.
- TMACOG supports financial assistance to homeowners based on economic need for sewer taps, repair, or replacement of sewage treatment system.
- TMACOG recommends priority financial assistance to local jurisdictions to fund construction of sewer extensions, including the cost of sewer laterals, based on financial need and degree of watershed impairment.

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### Agricultural Policies

The Western Lake Erie Basin (WLEB) is approximately 9,300 square miles and is dominated by agricultural activities that account for almost 70% of the total land area. Nearly two-thirds of the land is managed as cultivated cropland and there are 143 permitted concentrated animal feeding operations (CAFOs). The 2012 Census of Agriculture for Ohio reported the net cash farm income of operation to be approximately \$1 billion for the 19 Ohio counties within the WLEB. This indicates that agriculture is a significant contributor to the regional economy.

Most of the regional agricultural land is in areas where wetlands, including the Great Black Swamp, were once the primary landscape feature. These areas include highly productive soils, but have poor drainage. From the mid-1800s to the present, drainage ditches and subsurface tiles have been used increasingly throughout the region.

Many studies indicate that agricultural practices are the primary sources of nutrients (especially phosphorus) to Lake Erie. About 85% of the total phosphorus load from the Maumee River is derived from farm fertilizers and manures which are transported to surface waters via surface runoff and subsurface drainage. Many policies can assist farmers with management practices that have been shown to be effective in preventing the transport of excess nutrients.

#### TMACOG Policy Recommendations for Agricultural Policies

##### *Federal and State*

- Support agricultural practices that limit surface and subsurface applications of commercial fertilizer and manure based on agronomic need.
- Consider limits to tile drain density based on peer reviewed research that considers soil drainage requirements and correlations between tile drain density and nutrient loss.
- Keep successful and innovative conservation programs like Conservation Innovation Grants and Regional Conservation Partnership Programs in the Farm Bill.
- Lobby for shifts in policy that promote retiring marginal, floodplain agricultural fields and allowing them to return to natural areas or wetlands. These lands buffer waterways, improve water quality and wildlife habitat, and lessen the stress on already overextended crop insurance programs in flood-prone areas.
- Request that Ohio Department of Agriculture work with Ohio EPA and Ohio DNR to revise current permit requirements for CAFOs in consideration of the size of operation, watershed impairments, surrounding land use, and proximity to environmentally sensitive areas. Such revisions should be implemented prior to ODA issuing new permits to CAFOs.

##### *Regional*

- Support practices that allow producers to control tile drainage from farm fields and to implement other BMPs to reduce use of phosphorus while maintaining profitability.
- Support the use of agricultural conservation practices to reduce soil and nutrient losses from agricultural fields.
- Local governments should consider incentives, easements, or voluntary land purchases to establish setbacks from waterways.
- Support collaboration between farmers, SWCDs, and co-ops in implementing Ohio senate bills addressing agricultural regulations and the application of fertilizer and manure.
- Work with local groups and universities to identify new methods for improving soil health and water quality. Work on tracking successes and scaling up these new best management practices (BMPs).

### *Funding*

- Support funding for row crop farmers to implement precision fertilizer and manure application based on accurate measures of soil conditions and for animal feeding operations to implement BMPs and/or manure management plans.
- Support funding for expanded edge-of-field monitoring, targeted soil testing, and interpretation of results
- Support funding for expanded use of drainage control structures, application of amendments to fields, installation and maintenance of edge-of-field treatment systems, and other innovative practices that address dissolved reactive phosphorus challenges.
- Support funding for wetland and riparian restoration projects, especially in frequently flooded and/or marginal production areas.
- Recommend increased funding for a robust research and monitoring network to assess the efficacy of agriculture BMPs, to quantify pathways of nutrient loss from agricultural operations, and to document progress toward meeting nutrient reduction goals.
- Increase funding to Soil and Water Conservation Districts for technical support and education to farmers and landowners and to play a larger role with watershed improvement planning and implementation functions.
- Support funding for watershed-based planning that engages the agricultural community in setting measurable goals and strategies for conservation and BMP implementation.
- Increase funding to the Ohio Lake Erie Commission (OLEC) to lead and coordinate the Ohio Domestic Action Plan and the many other duties for which it is charged. Under OLEC's leadership, many state agencies and dozens of departments must work together to ensure that all operations lead to improved nutrient reduction practices.

### **SIDE BAR**

Farmers are resourceful stewards of the land and have historically been at the forefront of environmental conservation. All policies should continue to reward and encourage the men and women who feed the population. Food is cheap and plentiful in the United States. Policies that reimburse food producers for their environmental stewardship may raise the cost of food to reflect the actual cost of production.