

NLRS Final Meeting
19 May 2014
IEPA Headquarters, Springfield, IL

SUMMARY:

- I. Introduction and Timeline
 - a. Comments from the Policy Work Group are due to Corrie Layfield by May 30.
 - b. IEPA and IDA will make adjustments to the Nutrient Loss Reduction Strategy by mid-June, and the Illinois Water Resources Center will complete the final layout and editing
 - c. The NLRS will go out for a public comment period approximately mid-July
 - d. Final adjustments will be made and the NLRS will be submitted to the USEPA during early September.
- II. Flow Chart (attached, last page of notes) is used as a visualization tool to progress through the strategy
- III. Chapter I: Introduction
 - a. No objections to adding "loss" to the name of the strategy
 - b. The background information as to why a 45% reduction was chosen as the goal for Mississippi River basin states' nutrient reduction strategies will be more carefully explained
- IV. Chapter II: Science Assessment
 - a. The Science Assessment has undergone peer review and been appropriately updated. There are some cost adjustments.
- V. Chapter III: Watershed Prioritizations
 - a. Concern that loading is counted twice, both through the loading column and Column 9, which measures if point source inputs are greater than nonpoint source inputs
 - b. It is difficult to determine if watersheds are ranked due to local water quality impacts or loading impacts; the table should be more clearly labeled to make that apparent.
 - c. There is a disconnect between rankings on the priority watershed chart and the agency permit strategy in point source priority watersheds. The current system makes it appear as if different conditions are applied to point sources if they are in priority watersheds, while really the same permit limits will be applied to all point sources regardless of ranking.
 - d. Watershed plans receive too many points; consider grouping into categories with a maximum limit of points.
 - e. There was a lack of consensus on this chapter during the meeting. A Survey Monkey poll will be distributed to Policy Work Group members to gather input on this chapter.
- VI. Chapter IV: Goals and Milestones
 - a. Phosphorus and nitrogen have different interim milestones due to high point source phosphorus reductions that are expected.
 - b. There is a lack of local water quality goals. If the purpose of the strategy is to also improve local water quality, then the goals and milestones should reflect that.

- c. Goals will use 5-year rolling averages
 - d. Years used to determine baseline were incorrectly identified
- VII. Chapter V: Key Nutrient Reduction Programs
 - a. Send updates to Corrie Layfield
- VIII. Chapter VI: Point Sources
 - a. A 45% reduction was assigned to each category based on the findings of the Science Assessment, which found that nutrients were fairly evenly split among sources
 - i. Should recheck section to ensure that it accurately reflects what the Science Assessment indicates
 - b. Goals and milestones were set to be proportional to the source. The Science Team examined the sources, needed changes, most cost-effective means of reaching the goal, and mixed and matched goals.
 - c. MS4 should not be referred to as a nonpoint source. They should be considered urban stormwater.
 - d. IEPA will work to make prioritization process and associated actions more clear
 - e. TMDLs will be moved to the bottom of the list of current programs and actions addressing nutrients
 - f. Some additional clarification about what treatment plants contribute to “downstate” loading
- IX. Chapter VII: Agricultural Areas
 - a. Some sense that implementation pieces were missing from this chapter. These should be addressed through:
 - i. Developing an exploratory committee to establish improved coordination among state, federal, and industry-related initiatives to explore clean water certification and outreach and education initiatives related to the strategy. Should be titled: Agriculture Water Quality Partnership Forum
 - ii. These concepts are not new in Illinois, and the strategy should build on the existing foundation
- X. Chapter VIII: Urban Stormwater
 - a. An implementation piece is still missing
 - i. The Urban Stormwater Working Group should continue
 - ii. IEPA will be the convening agency
- XI. Chapter IX: Accountability and Verification
 - a. Monitoring coordination in the past did not progress very far.
 - i. This effort may be more successful because the right level of people will be involved
 - b. Illinois does not have a good handle on its baseline conditions
 - i. This is a very labor intensive process
 - ii. Illinois’s transect survey may provide more useful information that wasn’t available to other states in their efforts to determine baseline BMP implementation
 - c. There are more data sources available from KIC, and those will be used in calculating baseline

- d. Page 66 suggests ideas but doesn't suggest implementation. That will have some editorial adjustments to improve that language.
 - e. A timeline should be developed for the establishment of the Monitoring Council, including establishing a baseline for the state.
- XII. Chapter X: Public Reporting
- a. Meeting and reports should be released every two years
- XIII. Chapter XI: Numeric Nutrient Criteria
- a. Many decisions ride on continuous dissolved oxygen monitoring. This should be highlighted.
 - b. Stakeholders will be updated and this will be an open process
 - c. What will watershed standards entail?
 - i. Would local watershed standards trump TMDLs?
 - ii. How will attainment be accomplished?
- XIV. Chapter XII: Funding
- a. Policy Work Group will continue working on identifying funding requirements for implementing the strategy
 - b. Given the size of the budget, it seems that the General Assembly should be included at some point:
 - i. The Policy Work Group are the advocates of the strategy and should develop a plan to address these projects with the General Assembly
 - ii. There may be an option to add members from the governor's office to the Policy Work Group
 - iii. The strategy does not require legislative permission, because Illinois has the Pollution Control Board
 - c. Ideas like an Environmental Utility or a legacy fund should be explored down the road, but Illinois's current budget condition would probably make it unlikely to pass right now
 - d. Given the demand on the State Revolving Fund, is it wise to add nonpoint source projects?
- XV. Chapter XIII: Adaptive Management
- a. Remaining questions about who would be responsible for this step, likely candidate is the Policy Working Group
- XVI. Additional Questions:
- a. Should be consistent about expressing reduction goals in pounds, because that language is more meaningful to farming community
 - i. If the nutrient loss reduction could be quantified on a per acre basis, that would be a tremendously useful outreach tool to the agriculture community
 - b. The Monitoring Council can help develop a timeline for establishing loading and BMP baselines
 - c. The last three chapters are very short, but these are consistent with other states' nutrient strategies. Other ideas can be submitted by Policy Work Group members.

COMPLETE NOTES:

- I. Meeting Introduction and Structure
 - a. Consider implementation
 - b. Clarifying questions
 - c. Looking for broader comments, not word-smithing
 - i. Be specific about details, don't just criticize
 - d. Looking for what's missing to keep the strategy going once the writing process wraps up
- II. Timeline
- III. Flow chart
 - a. Flow to process, look at where each section includes implementation, etc.
 - i. Priority Watersheds
 - ii. Monitoring
 - 1. N & P Leaving State
 - 2. BMP implementation
 - 3. Water quality in priority watersheds
 - iii. Public reporting
 - iv. Adjustment in strategy
 - 1. Priority watersheds may change
 - 2. Enabling legislation
 - 3. Funding
- IV. Chapter I: Introduction
 - a. Name Change
 - i. No objections
 - b. Reduction goal expressed in Hypoxic Zone area or percentage: 5000 km² or 45%?
 - i. 45% reduction in 1980 to 1996 loading to Gulf
 - ii. Put focus back on the original three goals: size of Hypoxic zone, current science suggest that need 45% to get there.
 - iii. Tighten this language throughout the strategy
 - iv. Any chance the 45% goal will change?
 - 1. Unlikely
 - c. Other Comments
- V. Chapter II: Science Assessment
 - a. Comments to Science Team
 - b. Some cost increases came up during the peer review, and those changes have been made
- VI. Chapter III: Watershed Prioritization
 - a. Lingering questions:
 - i. Some concerns about prioritization: prioritization watersheds based on four main factors. One is loading, point source is greater than nonpoint sources or vice versa, but unsure why need this factor, because table already bases ranks on loading? Seems duplicative.

1. Another piece of the matrix to further divide out the watersheds. Can come out. Just need to discuss and see what happens?
2. Would it make a significant difference in rankings?
 - a. Probably not. Was a low point score.
- ii. The strategy for prioritization. Load reduction and local water quality impacts. But right now, it is difficult to determine whether a particular watershed is at the top of the list based on loading or local water quality. Seems they need to be characterized as local or loading.
 1. As moving forward, know what trying to accomplish in that particular watershed?
 2. Yes, say, this is at the top, loading and water quality impacts are equally important or how rated.
 3. Ultimately, need more labeling on tables, so can tell if it's local water quality impacts or loading that is the main reason that it's a target watershed.
 - a. Yes, can do that relatively easily.
- iii. A disconnect between permitting requirements and the priority watershed list. For point sources, same actions are applied, no matter where their watersheds fall on list. Also, maybe too early to decide how to spend money.
 1. So: prioritization not necessarily between local water quality and hypoxia section. In Point Source Section is a two-pronged approach, to look at loading and local water quality.
 2. Prioritization approach seems to express those, based on final watersheds selected.
 3. Not a lot of connection between final management and prioritization table. So priority list suggests that more going on in priority watersheds, but permits will just be issued on permit cycle. Not prioritizing point source actions.
 4. Can address in the Point Source section.
 5. Makes a lot of sense in the nonpoint sources. Just seems that the connectivity on the point source side is a bit off.
 6. Very specific suggestions in the comments would be helpful.
- iv. Counting something twice. Concerned about Colum 9 distinctions. This is already captured by loading. Max loading is 8, and the point source vs. nonpoint source is 4, so still not a trivial number. A low loading watershed might still rank highly.
 1. If a watershed has high loading from point sources, it shouldn't rank high on the nonpoint sources to be fixed. If loading is from the point source, then fixing nonpoint sources won't change anything. And vice versa. But the loading only matters if target the correct source. Not fixing the right problem, doesn't matter if get better on the wrong source.
 2. But watersheds are not ranked by nonpoint sources by total loss, but the nonpoint source loss, so ranking by sources.

3. Example, the Upper Fox is mostly point source impairment. Drops the priority for nonpoint sources.
 4. Can look at the watershed plans, but decrease the points assigned. Rank the points for the watershed plans. That may adjust the rankings more accurately.
 - v. Also had concern about the numbers of points based on the watershed plans.
 1. Do category rather than pure numbers
 2. Use the same list of categories, but each have a different weight
 - a. For example, loading could be given different percentages
 - b. Watershed plans could different percentages again
 - c. Weight the category itself, not the ranking in the category
 - vi. Heard a lot of different perspectives: consensus:
 1. Pure number on number of watershed plans or ranked category, or something more weighted:
 - a. Like categories and a max of 8 points of that category
 2. Using max numbers in each category has already weighted the system.
 - a. Increase the max for the loading category
 - b. There are yields, not loads
 3. Count “twice” on loading.
 - a. Yes, make separate lists for sources and not have second category
 - b. Yes, just take it out.
 - vii. We may need to have a smaller working group to address:
 1. Survey Monkey would be a good way to address, series of specific questions.
 2. Want to send questions/ideas suggested than go with that
 - viii. Yes, but think we can support total pounds rather than pounds per acre.
 1. Mostly this isn’t a problem, but it does change some of the target watersheds
 - b. What does priority watershed mean, and how will it be applied?
 - i. Need to explore what it means besides money
- VII. Chapter IV: Goals and Milestones
- a. Different goals at different times, because point source reduction of P is going to be large
 - i. Nitrogen doesn’t have a number in the point source side, but based on what the agricultural nonpoint source subcommittee projected, 15% reduction by 2025
 - b. Local water quality focus is gone. Focus is entirely on Gulf of Mexico. Add that second goal from the Intro to this section.
 - i. Seems like the focus of the document is the Gulf, rather than local water quality

- ii. Well, the national motivation is the Gulf
 - iii. Need to focus it on local water quality, too, or the people of Illinois aren't going to have buy-in
 - c. Maybe think about some local goals. Such as number of watershed plans, etc.
 - d. Using rolling average to determine whether met goals?
 - i. Yes, 5 year rolling averages
 - ii. Can't just look at one year, need to look at long term trends
 - iii. Plus, going to look at all the individual activities at the same time.
 - e. Questions
 - i. Spell out the discrepancies—1980 to 1996, need to express the years correctly
- VIII. Chapter V: Key Nutrient Reduction Programs
 - a. Missing programs
 - b. Contact Information
- IX. Chapter VI: Point Sources
 - a. Any specific questions
 - i. 45% across the board, but giving that the sources are vastly disproportionate, not sure why assume we'll get an equal reduction from each source.
 - 1. 3rd paragraph—why not 50% of total from point source and 40% from agriculture, based on how difficult to reach goal?
 - 2. Based off the Science Assessment—showed that about equal contribution from both agriculture and point sources.
 - a. Total P and total N
 - 3. Not following, because the total pounds of reduction reflect the different sources in the state.
 - a. Yes, pound goal is different, but the percentage goal is the same?
 - b. Sentence saying the Science Assessment indicates the pounds of P reduction, but don't think the Science Assessment said anything as specific as this number of pounds from this section.
 - 4. Understanding of Science Assessment (SA) said need this reduction from this to get 45%
 - a. But that's not what the SA says, so correct that language
 - ii. Not clear that these percentage goals are what were actually agreed to
 - 1. Need to think through total goal; what is the most logical way to get there. At points it seems that arbitrary cut is made here and there
 - 2. The goal is to make goals and milestones proportional to the contributions
 - a. Science Team splits, looks at total percentage changes. Looked at cost effective means of getting to goal, and mixed and matched to get there
 - b. Ok, for example, certain reduction in agriculture and point sources have different goals, are those split?

- i. Yes, they were—SA looked at
 - iii. MS4 is a point source, and the document refers to urban stormwater as NPS; that seems inaccurate
 - 1. Let's just call it urban stormwater and drop the NPS label
 - b. Priority watersheds
 - i. Couple questions: idea that use existing rules and convert to permit limits, a number of mechanisms for this: TMDLs. Called out to be done in next permit. Is that because in priority system?
 - 1. Was to identify current programs in place.
 - 2. We're already doing it, match up anyway.
 - ii. Looking for how to match up future actions in a way that address future actions to priority approach?
 - 1. Yes, or make the approach clearer. Looks like two bins. Bin 1, get limits. Bin 2, get some time to explore and figure it out, and then get limits. Seems that the points and rankings don't seem to enter into this at all. Obscures the decision making process. Seems like there is a link that isn't present.
 - a. How do the point source strategic actions play out for priority watersheds and non-priority watersheds?
 - b. Yes, doesn't seem to relate to rankings in tables in Priority Watersheds
 - c. In HUC 8 encompasses actions that have already been started. Already have planning and implementation going
 - 2. Set priority system, and doing this to set goals. Doesn't happen here.
 - a. I would say, do it to implement actions identified. And order
 - b. Well, if you're plant number 17 on the list, will changes be different than if ranked 97 or just when permit comes due?
 - i. Yes, will work on this.
 - iii. TMDLs discussion—unclear what is intended here? As I understand, no nitrogen TMDLs being done, except nitrate in drinking water, and P is only in lakes. Is that correct? If so, seems like too much emphasis on these programs.
 - 1. Intent here isn't how to prioritize TMDLs
 - 2. Concerned that is a bit misleading, because has agency ever done a TMDL for N and P, except for drinking water and lakes? So seems a little misleading, unless the agency intends to change process for N.
 - a. So want a statement of the current limitations of existing TMDLs and future directions
 - b. Should be reordered, put TMDLs at the end of the list
- X. Chapter VII: Agricultural Areas
 - a. Implementation:

- i. Cost-Share Subcommittee in NRCS State Technical Committee
 - 1. Bring together state and federal to coordinate cost-share
- ii. Exploratory Agricultural Water Quality Certification Committee?
 - 1. Coordinated management plan, some are required by law based on what or how much producing, some are voluntary
 - 2. Tailored nutrient management plan for operations
 - 3. BMPs implemented, program reviewed by independent certifier, certified or improvements, and then some kind of “reward” through priority cost-share/regulatory certification/recognition. Slightly modeled off MN.
 - 4. Question for group: as the strategy is currently written, idea isn’t in there. Want it back in, should a committee to explore this be developed? If so, who on committee, who convenes, and what timeline for study:
 - a. Yes, should be in the plan—should be under the comprehensive management plan
 - b. What would be the goals of the agriculture community in getting involved? What would they want out of it?
 - c. There are already some voluntary programs like this for exports. Not a new concept in the state.
 - d. Discussion was to look at what other states doing and see how worked and if pitfalls.
 - e. Convening agency?
 - f. Part of the challenge is that we have certain regulatory requirements that do have components of this, some voluntary components of this, all these different pieces. Envision this group to look at those pieces, look at gaps, what are the positive pieces, and see what is most appropriate for Illinois. Right now there may be a waste management plan, NRCS may be certifying voluntary practices, IEPA on CAFOs, if nothing else, get some consistency to all these plans. May help with cross-compliance.
 - g. Any objection to putting an exploratory committee in place?
 - i. No objections
- iii. Outreach and Education Steering and Coordinating Committee?
 - 1. Multiple agencies doing this. Lots of dialogue about training and continuing education. Need a group to get together and think about coordination of this, how the pieces fit together, and develop a plan so this goes operational and things happen. Didn’t reach point to describe committee or give it a name. Who should be on it, who should convene?
 - 2. First question, any objection to putting some language describing how this committee may be developed:

- a. Know CCA has this on its priority list to develop. Looking for this kind of thing, no objection if doing something like this. Also, this is at the individual-level of the farmers. Could use the CCA board, and it seems like a common-sense place to do this.
- b. Wondering if the pervious committee could address this issue as well. And this because already so many groups doing so many things. Need some way to bring these all together. Not sure what this should be. Would like to avoid having too many committees. Could work on those forums or at least a forum to discuss these issues.
- c. A forum seems like a good idea, because that's what the farmer groups are working on. But would be nice to know what's going on with the other groups.
- d. Conclusion: develop a forum, one committee, or structure that gets people together and discuss and will address both certification and outreach and education

XI. Additional comments:

- a. Need for clarification (pg. 37) table—big category for “downstate” with total annual reduction of 4.1 million lbs—trying to figure out what that represents. Other sections seem pretty clear. Did IEPA look at specific permits in downstate plants, or everything in Illinois River, etc.?
 - i. What is the downstate component of P—every municipal not in Fox, Des Plains, MWRD, and (Du Page?) —it really is everything else.
 - ii. Would like some more information about that areas. 3.8 of the 4.1, is that the percentage that gets limits, or is it something else? Planning to overshoot on everything?
 - 1. How to get 124, and what is the plan for that group?
 - 2. Sounds like there will be a sort, and a rule will be applied and permit limit and some not. So is that sort going to happen, will it be done or not?

XII. Chapter VII: Urban Stormwater

- a. Stormwater Subcommittee—no group identified to keep this on track
 - i. Number of groups working on urban stormwater—how to include them?
 - ii. Doesn't seem like a need for this group unless a very specific call to actions
 - 1. Subcommittee meetings brought up these issues; not sure they need to a subcommittee to address this
 - 2. If the plan were changed to show these issues, that would help
 - iii. Wouldn't it break out by watershed? Local water quality impacts
 - iv. Well, some are statewide issues, but hasn't been assigned. May need some additional discussion.
 - v. Doubt that these things will just happen. Might as well survey for interest and see what happens.
 - vi. Any existing committees?—not statewide, at least?

- vii. Does there need to be a convening agency?
 1. IEPA would be convening agency
 2. Perhaps the subcommittee could live on
 3. Green infrastructure and stormwater or nutrients only?
 - a. Can be stormwater
 - viii. Stormwater and nutrients are related.
 1. Group felt that stormwater volume will result in nutrient reduction, so there are many people working on this already
 - ix. So some kind of implementation group seems like a good idea
- XIII. Chapter IX: Accountability and Verification Measures
- a. Monitoring Council
 - i. Expect that it have dedicated funding?
 1. Will look at types of monitoring. Can't say what money right now, but identify the proper approaches
 - ii. What will this council accomplish? Could see some coordination, but not expecting agencies letting council tell them how to do monitoring
 1. If people at the right level are participating in the discussions, may see a different outcome than efforts in the past
 2. Maybe data coordination—would require the monitoring people to coordinate on this
 - iii. Amplify one point: comments as we started sending out the document—don't have a good handle on baseline.
 1. Things like CREP has tried to develop this and were overwhelmed by the amount of staff time needed to do this
 2. If and when establish a baseline, where would that information be? What are the other variables to know baselines?
 - a. Have a reasonable grasp on what government does every year, but yes, don't have a grasp of what is funded privately. It would be to our advantage to determine baseline
 - b. Have any other states developed this?
 - i. Chesapeake Bay region tried this, and had lots of difficulties.
 3. Look at annual loading reductions, should also look at dollars/pound to see if any of these are cost-effective and evaluate what are most effective and useful.
 4. The transect survey has the potential to address some of those questions. Do some adjustments, and we should have a fairly decent estimate of things like cover crop, etc. But we will need to make adjustments to how survey is done to answer these questions.
 - a. That's a really good point. Most of the other states have tried to do this on a recording system that doesn't stay up to date, but since we visit places, that provide a lot more data.

b. That is another thing a coordinating council could do is address those questions.

b. Questions and Concerns

- i. More information about fertilizer application—KIC data, is there some plan to share that information?
 1. Yes, this is placeholder information.
- ii. Pg. 66—seems like some ideas, but not really a plan. Maybe just some editorial tweaks
 1. IEPA baseline programs and what has been added to monitor with respect to nutrients. Then, there are some options available to look at progress. Looking at ambient, etc., so which one of these should be added?
 - a. Yes, make a firmer statement.
- iii. To what level of accuracy or error would hope that monitoring would meet? Need to know at what level data should be collected. A great challenge, but should at least be addressed, otherwise left without knowing what level monitoring needs to occur.

XIV. Chapter X: Public Reporting

- a. Annual report
- b. Annual meeting
- c. Nutrient Water Quality data added to Integrated Report
- d. Should anything be added?
 - i. At this time, it's hard to see how the mass loading reductions for the purpose of the Gulf would fit in a 303(d) report?
 1. Yes, that wouldn't appear in those loading reports. Is more the local water quality.
 - ii. Wondering if the reporting should be reported less frequently, less of a burden?
 1. Well, more about implementation on an annual basis, not the changes.
 2. May want to set up a tier. Implementation every two years, 303(b) report on water quality. Loading every 5 years.
 3. Any recommendations on this schedule would be welcome.
 4. Is the group comfortable with a two year report instead of annual?
 - a. Yes.
 - b. However, Hypoxia Task Force does a reassessment every 5 years. Every 5 or fewer years would match up fairly well. But we are supposed to do an annual update to the Task Force on implementation.
 5. Meeting—if reporting every two years, would meeting be every two years.
 - a. Seems that the report would drive the meeting, so makes sense that it be every two years anyway.

XV. Chapter XI: Numeric Nutrient Criteria

- a. Establishment of Numeric Criteria Science Advisory Committee. Proposed timeline. Rule packet would include the assistance of the science committee. Some of these sections would be watershed specific.
- b. Concerns?
 - i. Environmental sector does not agree that the data aren't conclusive, believes timeline isn't sufficient. Criteria should be developed on a quicker schedule than proposed.
 - ii. Continuous DO monitoring—allusions to this. Part of this over the effort of when and where this occurs. Is important to a number of different things, particularly how the agency looks at various things. Violation of DO standards and limits of NPDES permits, the continuous DO monitoring has weight on this.
 - 1. That is something that could be given to Nutrient Monitoring Council to include that in monitoring plans. Design as part of monitoring.
 - 2. Didn't see that in their charge.
 - 3. Just about everything above that section, that will be part of their charge.
 - 4. Many permit decisions now ride on continuous DO monitoring, so need to highlight that.
 - iii. Stakeholder updates on this?
 - 1. Follow order of EPA science boards and National Science Advisory councils. Receive information from a variety of interests, and collect the perspectives of various stakeholders. Would be an open process
 - iv. Watershed basis—will be more difficult to do than on a statewide basis. Would prefer a statewide standards and then use TMDL that would trump statewide standard if needed. But given the data demands already, don't want to see TMDL or criteria based on one or two data points.
 - v. What is meant by watershed standards? Seems like some of the work in the Fox River is being used as an example.
 - 1. Was using the work in the Fox as an example, but perhaps that is incorrect?
 - 2. Fox River workgroup is looking at TMDL-type number.
 - 3. Goal as of now is to address DO, so not going to be N & P.
 - 4. Seems that a P load would be concentration.
 - 5. In Fox can have very low concentrations in P, impoundments will play a big role in this. Focus is not to look at P standard, look at how to achieve DO standards.
 - 6. Could be that the Science Assessment committee could not provide a pathway to do the standards this way, but there is an interest in doing this on a watershed basis.
 - vi. Seems like putting several concepts together. What are the mix of measures that will help achieve attainment use? What is the plan, such

as dam removal or TMDL to achieve designated use? Is different than setting P standards. That goal is designated uses.

1. Not saying simple, but just an expressed interest

XVI. Chapter XII: Funding

- a. Part of implementation is funding, and where does the funding come from? Agriculture Areas and Urban Stormwater identify some methods of funding. Meeting in Chicago addressed funding sources. Main part of document mention the Clean Water Initiative expended to include NPS.
- b. Mechanism to keep funding discussions going. Who will be doing this? How to keep the momentum going?
 - i. Policy Working Group may continue this work
 - ii. Given the size of the budget for these projects, at some point need legislature to speak to this. When talking hundreds of millions, need legislature to say “yes, this is the direction Illinois is going.”
 - 1. What is the mechanism for this?
 - 2. Would a legislature be open to this?
 - a. First of all, this is not an IEPA plan. It relies on the actions of many outside government. So can certainly have legislation, but it’s broader than that.
 - b. Understood that there was some push back in Wisconsin about this, and they started with legislation.
 - i. Their process requires legislation to approve things. Illinois has Pollution Control Board
 - c. Legislature involved in this
 - i. Just funding?
 - 1. No, but start there
 - ii. Recommending that Work Group be expanded to include legislature personnel, or people who will bring up to legislature
 - 1. Yes. If the state isn’t willing to spend money on this, what is the point?
 - iii. Not a new discussion. We had this discussion 15 years ago. Sending idea back to USEPA and federal government. Say, if federal priority, then need to pay for it. Trying to scope this out, can show numbers and data to look at the scope of this question.
 - iv. Congress passes laws, whether you agree with them, we have a set of congressional requirements. Also, there are economic avenues that should be explored. When there are requirements on cities and municipalities and they can’t afford them, they can go to legislature. Illinois legislature doesn’t have much to say about this. Guess is that we’ll have to get at what

the law requires and use available tools to phase in in a way that won't break municipal budgets.

- v. Does need to be a means to engage with the General Assembly so they are aware of the dollars involved, so they can determine how important this is to their constituents.
- d. Would be consensus to address this through Policy Work Group and then engage at a next level: thoughts:
 - i. Can't see a different group, because this is the group that cares about this issue. Legislatures are going to take cues from constituents. But can address by saying "here's a water quality issue need to address." Doubt these funds will be from appropriations. Probably from communities.
 - ii. 60 million is a funding gap. Hundreds of millions is a funding chasm. Perhaps address the Governor's Clean Water Initiative to develop a grant program to address part of the 45% reduction.
 - 1. Who does this?
 - 2. Need to have the policy makers in this. Talking implementation, need some legislative involvement.
 - iii. What about keeping the Policy Working Group and then add some high level people, such as governor's office?
 - iv. Think this discussion is being framed oddly. Don't need legislative permission. We are the advocates of the plan. It's more how to get legislative people involved to make this happen.
 - v. Many options in the strategy, but we need to finish exploring those options before we start engaging legislature. Lay out who does what, look at what's left, and then pursue our ideas of how to get it funded and then debut to legislature, especially when we're not sure what we're pursuing in each section yet. We should make final decisions and then bring to General Assembly.
- c. Things to think about in the future:
 - i. Environmental Utility
 - ii. Legacy Fund
 - iii. I would say not in the plan, but need to look at other budget issues in Illinois right now. Timing isn't right.
 - iv. I would agree. Down the road a sort of thing. Some of these ideas aren't ready to implement.

- d. Do point sources get to wait for funding for implementation?
 - i. Sequence of implementation for point sources that there will be a lot of funding available.
 - ii. But it is loan money that must be paid back.
- e. There are some funding ideas suggested in other sections.
- f. Question about the first bullet in the funding section: State Revolving Fund is going to include NPS projects. What is the current demand from point sources? If an over-demand of that money, is it wise to divert to NPS projects?
 - i. Asking if too much demand on point sources, room for NPS? Yes, high demand on both sides.
 - ii. Demand is there for point source; Farm Bill available for NPS.
 - 1. Legislation is on track.

XVII. Chapter XIII: Adaptive Management

- a. Who is responsible for making sure this happens. In plan, the policy work group would take responsibility for this.
- b. Additional pieces that need to be established?
- c. How will the Policy Working Group be maintained through the years?

XVIII. Additional questions:

- a. Revised of Point Source priority list soon? IAWA is having meeting in 8 days.
 - i. Yes, we can do that to make sure correct information is pulled from Science Assessment.
 - ii. Decided what going to look like?
 - 1. Yes, going to do the pounds correctly.
 - iii. Survey?
 - 1. That will take more time to get done.
- b. Opinion: Chapter 6: Point Sources discusses pounds. In referencing Chapter 7: Ag Areas, talk to my groups, how to equate losses in pounds? Farmers think about N and P in lbs, and the NLRs expressed that way in Point Sources, but not in the agriculture section. Easier for a layman to understand if losses are in lbs.
 - i. Some areas of state have bigger losses.
 - ii. Can't average over whole state.
 - iii. Trying to figuring out how to use supplemental information to talk to people. That way, more of a tangible goal than 45%.
 - iv. That's why we put loss in the title. Don't want people to think that they must reduce inputs by 45%, rather the degree that's coming off fields.
 - 1. For outreach, need to develop some different things.
 - 2. 319 projects reduce X lbs per year, but look at target numbers, but like the idea of how that breaks down to each farmer. So can say, not asking for 45% reduction or two farmers to change everything and that will solve the problem, just a small change per acre.
 - 3. Farmers think in unit per acre. If we can say to a farmer reduce %/unit, the smaller that number, the better it will go

over. If we only express state totals, we will isolate or separate people.

- v. For example, in tile-drained areas, say 15/lbs loss per acre. No input, loss.
- vi. This number should be figured out for the outreach. Need to worry about semantics a bit.
 - 1. Is about the outreach, how the message can be accurate and understandable.
- vii. In this setting, absolute amount isn't so relevant.
 - 1. That's right. These reductions could be achieved without changing input.
- c. Just wanted to make sure there is a second chance to make comments?
 - i. Yes, Policy Working Group reviews, and then out to public comment
- d. Timeline and sequencing: BMPs spelled out. For example, what happens until have baseline? If measuring impacts, need to know where at? Wondering if the plan develops this? At least a sequence; maybe not dates, but at least an idea of what needs to happen before something else
 - i. This would probably fall under monitoring council
 - ii. If challenge is to show change, then need to have defensible starting point.
 - iii. Include starting date for monitoring council.
 - iv. Sequence of implementation is important to document overall.
 - v. Number of fairly involved efforts on similar issues before, and started without a good baseline. Need that.
- e. Last three chapters are fairly short. Will those be expanded, or does the Policy Work Group need to provide material to expand?
 - i. If something missing, then those should be the substance of comments.
 - ii. Work with IWRC to make things consistent, improve readability, mention funding three different places, etc. But what we would really like from Policy Work Group are the ideas and thoughts in appropriate language
 - iii. Last three are a little slim
 - iv. If there are key things missing, include those
 - v. Can take things out of earlier chapters and consolidate into last three
 - vi. They are fairly similar to what other states have done