

News From:
Advocates for a Clean Lake Erie



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**MANURE CONTINUES TO FLOW, OHIO EPA REPORT “GIVES NO CONFIDENCE OF
WATER QUALITY IMPROVEMENT”**

The Ohio EPA’s recently-released [“Collaborative Implementation Framework,”](#) for Lake Erie states that “since 2011 alone, more than \$3.1 billion has been invested in Ohio’s portion of the Lake Erie Basin...(pg. 4).”

Unfortunately, during that same time over 5.6 billion gallons of animal feces, urine and wastewater have been dumped, untreated, on fields draining into Lake Erie and only favorable weather conditions have prevented another 2014 Toledo water crisis.

Susan Matz, ACLE coordinator, said “Basically, all the report does for 41 pages is try to hide the fact that Governor John Kasich continues to let Big Ag decide Lake Erie’s fate while we pay with our tax dollars and our health. This report gives us no confidence that the Ohio EPA’s actions are leading to real improvement of our water quality.”

Proof of that is the report’s

- stubborn reliance on voluntary measures
- thoroughly inadequate approach to water sampling and
- satisfaction with throwing good millions after bad

There is nothing in this document about naming the names of who is responsible for those 5.6 billion gallons of excrement, nor any concrete plan to reduce it beyond mention of “best management practices” which have allowed the toxic algae to worsen. Without legal accountability for the sources and amounts of pollution, the OEPA’s “aspirational goal” to reduce the Phosphorous choking Lake Erie is more like a fantasy.

Until Ohio’s citizens break the spell Big Ag has on their state government and get an impaired designation for Lake Erie followed by a thorough cleanup, we will keep wasting precious time and money, Lake Erie will still be sick, and our drinking water will still be at risk every summer.

ACLE notes these five specific concerns with the Ohio EPA report, followed by the corresponding report excerpts:

- (1) The report utilizes data from stream surveys that are from 12 to 18 years old, for TP (Total Phosphorus) only, not DP (Dissolved Phosphorus) which is the main driver for toxic algal blooms.

- (2) Records generated in response to citizen complaints would be the most likely ones to indicate a problem. These were removed from the study.
- (3) This section means this report has virtually no value when it comes to determining the role agriculture, particularly CAFOs, play in the poisoning of Lake Erie
- (4) All the more reason to have an impaired status declared and do a thorough inventory of all pollution sources and amounts.
- (5) Only two “level one” priority sites were found in Ohio’s portion of the Western Lake Erie Basin and one of those was combined with a small waste water treatment plant. That is phenomenal to say the least.

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Ohio EPA Monitoring Data

- (1) Ohio EPA stream survey *TP data in the Maumee River watershed from 1999-2005* were examined as part of the evaluation to prioritize subwatersheds. Approximately 10,500 records were examined throughout this area. Samples of WWTP effluent were removed as not indicative of instream conditions.
- (2) *Records from samples collected as part of complaint response were also removed as not indicative of typical in-stream conditions.* To focus on HUC 12 subwatersheds, sites draining more than 200 square miles were removed. This included samples taken on the main stems of the large rivers.
- (3) The bulk of Ohio EPA samples are collected in the summer field sampling season when biological indices are assessed (March through September). *The result is a purposeful bias of low-flow sources representing a critical condition for stream biology. Using these data alone to prioritize nutrient export far-field, that is as it relates to Lake Erie loading targets, without hydrologic considerations (for example, weightings) is not appropriate. Rather these data are used to flag watersheds with relatively high TP concentrations and are currently most useful in understanding particular low-flow sources for nutrients, such as point source discharges.*

Determining Priority Levels and Implementation Groups

The priority levels were determined based on the hotspot analysis from the Scavia et al. 2016 report. The SPARROW model results do not consider DRP (Dissolved Reactive Phosphorus) and the model’s treatment of livestock manure input is overly generalized. Because of this, only the SWAT model results from the Scavia et al. 2016 report were directly used for prioritization in this Collaborative report.

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Priority level 1 implementation group 3: Prioritized HUC 12s of high livestock density

- (4) *Phosphorus sourced from manure makes up a portion of the total nutrients used in the WLEB. Manure application is generally difficult to represent using watershed modeling methods. Limitations include the complexity of exactly when, where and how manure is applied and the inability to accurately document and represent those processes. Consequently, the work by Scavia et al. 2016 does not identify areas that may have increased loading from manure application. Ohio EPA water quality monitoring data has identified areas where manure application potentially is the most likely nutrient source.*

- (5) Only two priority level 1 HUC 12s are currently included in this category (**Table C3**). Again, these two HUC 12s were not identified by the Scavia et al. 2016 modeling report. These are watersheds where large animal feeding operations exist, although specific numbers of animals at these operations have not been documented for this analysis. While the amount of manure applied within these watersheds has not been documented, Ohio EPA has observed elevated ambient nutrient concentrations without being able to identify or observe other obvious nutrient sources.

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(5) **Table C3:** Priority level 1 HUC 12 subwatersheds within the Maumee River watershed due to high livestock density (nutrient quantity and timing) implementation group

HUC 12	HUC name	Other sources
041000050206	Platter Creek	
041000050201	Zuber Cutoff	Antwerp WWTP (Waste Water Treatment Plant)

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