

Save Maumee Grassroots Organization Inc.
Help us to speak for our Rivers...for our Rivers have no voice



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Fort Wayne, IN 46805
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August 21, 2017

**RE: Public Comments on Indiana's Great Lakes Water Quality Agreement,
Domestic Action Plan for the Western Lake Erie Basin**

The Upper Maumee Watershed alone drains 430 miles of tributary perennial streams located in the historic Great Black Swamp. The Maumee River is the largest contributor of surface water to Lake Erie, and is a major source of sediment and nutrients entering the lake. Allen County Drainage Board maintains 2,500 miles of regulated drains and streams within Allen County, Fort Wayne municipality. It is important for local, state, federal government, and non-profit groups and agencies across Indiana and Ohio to work together for solutions regarding phosphorus and nutrient reduction in the Maumee River and its tributaries. Thank you for this opportunity to comment.

Save Maumee Riparian Buffer Initiative (RBI) is pleased to be a part of the first steps toward reclamation of our most valuable freshwater resources by planting riparian buffer strips within the three (HUC 12) subwatersheds that have been identified as degraded by the Upper Maumee Watershed Management Plan: Trier Ditch, Bullerman Ditch, and Six Mile Creek, all located within Allen County, Indiana. To date, our projects have restored over 5,000 linear feet of riparian areas on ditches, adding 1,940 trees to 2.87 acres of land. This will on average detain 114,460 gallons (59 gallons/tree/year) of untreated stormwater, to decrease flood damage, reduce peak runoff rates associated with storms, and corresponding reduction of phosphorus, nutrient and sediment loads into the main stem of the Maumee River.

By January 2019, Save Maumee's RBI will capture approximately an average 164,020 gallons of untreated urban runoff/year, reduce nitrogen load by 1,130 pounds/year, reduce phosphorus load by 671 pounds/year and capture 659 tons of sediment load/year by planting 4.13 acres of riparian buffers with 2,780 additional native trees. These numbers have been equated through following the Upper Maumee Watershed Management Plan, *Section 6.0: Goals, Management Measures and Objectives*. Save Maumee's Riparian Buffer Initiative has raised awareness successfully; we have logged 1,184 volunteer hours in 2016 and over 1,400 volunteer hours in 2017, to date. Read about the entire plan here: <http://savemaumee.org/save-maumee-riparian-buffer-initiative/>

Comments:

Fort Wayne's Board of Public Works Tunnel Project through the Long Term Control Plan should improve water quality after the year 2025, because the sewers will be separated and not discharge into the St. Marys River and Maumee River after the 5 mile long underground system goes online. Currently, Fort Wayne engineers are calculating exactly how much the reduced combined sanitary/stormwater discharges will improve the water quality. So the problem remains, non-point source untreated runoff due to alterations in land-use.

It appears that drainage issues are affecting water quality in Allen County. Allen County Drainage Board oversees the maintenance of 2,500 miles of streams. Less than half of those legal drain miles are draining into the shared waters of the Maumee River via its corresponding tributaries, which the Allen County Surveyor maintains. The Allen County Soil and Water Conservation District should also advocate more for retention of water on the land. The Maumee River portion in Indiana crosses all the political boundaries; leaving the City of Fort Wayne, Allen County and State of Indiana, skirting the issues into the State of Ohio. We must be more responsible in Indiana.

Drainage boards are key. Drainage boards were established to tile swamps, making them fields and the corresponding creeks and streams and rivers became ditches. Trees were removed along with the meandering and gently sloped riverbanks. All in the name of getting the water out of the wetlands and fields as quickly as possible. Now, many regulated drains/ditches/streams are devoid of vegetation, which is contributing to non-point source runoff of nutrients, phosphorus and sediment loading. Many government and scientific documents have reflected that trees and vegetation are helpful in improving water quality.

- To improve Lake Erie, it is now up to small groups, individual landowners, and local governments to do the work that will reduce runoff by holding water longer on the land, absorbing the water in the ditches before it enters the rivers. Therefore, removing trees and vegetation on both sides of ditches is counterproductive and a common practice.
- Assure the current practices of the County Drainage Boards, the County Surveyor's Offices and the County Soil and Water Conservation Districts, neither increase erosion and nutrient pollution, nor conflict with natural streambank protection & revitalization when working on ditch maintenance and approval processes of development. Counties should use best management practices to selectively remove invasive species & protect riparian buffer areas. As public officials, these entities are in a position

protect public health.

- Consider, as a general rule of thumb, that legal drains and ditches retain native vegetation on one side while the drainage maintenance machinery is able to access the ditch on the more easily accessible side. This makes monetary sense because it is less labor intensive and reflects the Indiana Drainage Handbook:
 - Practice 102 - Tree Preservation and Protection, “applicable to nearly every project.”
 - Section 5.5 The cost is less - "single bank modification that has modification is less costly.”
 - 5.6 Channel Excavation/Dredging “The overbank excavation involves the least amount of disturbance to be the channel and the natural habitat associated with it. However, it sometimes impacts the riparian habitat where excavation is occurring and will also normally require some degree of mitigation.”
- Public meeting to discuss the future relationship between native plants/trees and urban sprawl should be scheduled. A public hearing with decision makers and elected officials could work-out old drainage practices to correspond with current documentation of support for protection of trees on one side of ditches. Supporting documents here: <http://savemaumee.org/ditch-easements-need-vegetation/>
- Continue to fund Great Lakes Restoration Initiative projects. Save Maumee Grassroots Organization and the Allen County Drainage Board, have opened a channel of communication that will allow for more progress toward these goals. Save Maumee’s Riparian Buffer Initiative has already completed almost one linear mile of tree plantings on one side of Allen County ditches and streams. These restoration practices stabilize stream banks to decrease sediment, nitrogen, and phosphorus, by significantly increasing stormwater retention.
- Stop the sales of invasive plant, shrub and tree species. From a riparian land management perspective, it is important to note that invasive species are taking over landscapes and need maintenance funding as well. Forest professionals have said, “one does not need to add more trees to increase native species and support habitat, they only need to reduce invasive species and the native species will return.”
- More oversight is needed with the sales and application of chemicals containing phosphorus and those herbicides that contain an added surfactant. For example,

glyphosate™ with the added surfactant makes the chemical easier to carry, coating the active chemical, which makes it carry easily into water because it prolongs availability for an increased time period and does not dilute easily.

Thank you for your time in reviewing our comments and supporting the health and vitality of the Maumee River, which will benefit of the entire Great Lakes Watershed. Please do not hesitate to contact us.

Respectfully Submitted with Warm Regards,

Abigail King,
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Board of Trustees, President & Founder
Save Maumee Riparian Buffer Initiative Manager
Upper Maumee Watershed Partnership, Board Treasurer (2009-2014)
Upper Maumee Watershed Management Plan Development Committee (2012-2014)
Maumee Valley Heritage Corridor, Board's Env. Consultant: Region I (2010-2015)

Save Maumee Riparian Buffer Initiative Projects are made possible through the federal Great Lakes Restoration Initiative (GLRI) and U.S. Forest Service. The USDA is an equal opportunity provider, employer, and lender.

The purpose of Save Maumee Grassroots Organization is to preserve, protect and improve the ecosystems of the Upper Maumee River and watershed by increasing public awareness through advocacy, collaboration, education and hands-on projects. The organization operates as a charitable, nonprofit organization and has been recognized as a 501 (c)(3) since 2013. Save Maumee restoration projects began in 2005.