

Evaluation Findings

Illinois Coastal Management Program

October 2012 to October 2020

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Executive Summary

The Coastal Zone Management Act requires the National Oceanic and Atmospheric Administration's Office for Coastal Management to conduct periodic evaluations of the performance of states and territories with federally approved coastal management programs. This evaluation examined the operation and management of the Illinois Coastal Management Program by the Illinois Department of Natural Resources for the period from program approval in 2012 to October 2020. The evaluation focused on three target areas: the blue economy, resilience to coastal hazards, and program administration.

The findings in this evaluation document will be considered by the NOAA Office for Coastal Management in making future financial award decisions concerning the coastal program. The evaluation came to these conclusions:

Accomplishment: The Illinois Coastal Management Program has facilitated significant progress in removing beneficial use impairments in the Waukegan Harbor Area of Concern.

Accomplishment: The Illinois Coastal Management Program provided essential leadership for the development of the Millennium Reserve as well as the transition of the initiative to the Calumet Collaborative, a bi-state nongovernmental organization.

Accomplishment: The Illinois Coastal Management Program has successfully worked with communities to improve the environmental and economic health of underserved populations in the coastal area.

Accomplishment: The Illinois Coastal Management Program has successfully created ongoing intergovernmental partnerships to address coastal hazards along the Lake Michigan shoreline.

Accomplishment: Over the course of the evaluation period the Illinois Coastal Management Program has not only developed a new grant program but has worked to ensure that the application process is open to all eligible partners.

Accomplishment: The Illinois Coastal Management Program has addressed the remaining conditions and submitted the required documentation for approval of the Illinois Coastal Nonpoint Program.

Recommendation: The NOAA Office for Coastal Management recommends that the Illinois Department of Natural Resources create better communication channels between internal divisions and external partners to increase collaboration and reduce confusion related to projects in the coastal area.

Recommendation: The NOAA Office for Coastal Management recommends that the Illinois Department of Natural Resources coordinate with the Department of Central Management

Services to establish appropriate position descriptions and classifications for the Illinois Coastal Management Program.

Recommendation: The NOAA Office for Coastal Management recommends that the Illinois Coastal Management Program reconstitute its Technical Advisory Committee and Coastal Advisory Group to provide additional insights into community needs and to help track progress in meeting the program’s strategic objectives.

Recommendation: The NOAA Office for Coastal Management recommends that the Illinois Department of Natural Resources examine ways to ensure active participation in the federal consistency process by the Illinois Coastal Management Program.

Necessary Action: The Illinois Department of Natural Resources must submit a report to the NOAA Office for Coastal Management addressing the delay of grant payments to partners, of meeting federal financial award expenditure timelines, and of progress reporting by the Illinois Coastal Management Program by September 30, 2021. The report shall analyze the causes of the problems and propose solutions to be implemented by December 31, 2021.

This evaluation concludes that the Illinois Department of Natural Resources is satisfactorily implementing and enforcing its federally approved coastal program, generally adhering to the terms of the federal financial assistance awards, and addressing the coastal management needs identified in section 303(2)(A) through (K) of the Coastal Zone Management Act.

Program Review Procedures

The Coastal Zone Management Act of 1972, as amended (CZMA; 16 U.S.C. 1451 et. seq.) requires that state coastal management programs and national estuarine research reserves that are developed pursuant to the CZMA and approved by the Secretary of Commerce be evaluated periodically. Section 1458 of the CZMA and implementing regulations at 15 CFR 923, Subpart L, require that state coastal management programs be evaluated concerning the extent to which the state has: 1) implemented and enforced the program approved by the Secretary; 2) addressed the coastal management needs identified in 16 U.S.C. 1452(2)(A) through (K); and 3) adhered to the terms of any grant, loan, or cooperative agreement funded under the CZMA.

The NOAA Office for Coastal Management evaluated the Illinois Coastal Management Program in fiscal year 2021. The evaluation team consisted of Ralph Cantral, evaluation team lead; Diana Olinger, site liaison; Heather Stirratt, Great Lakes regional lead; and Rebecca Nicodemus, environmental scientist—all from the NOAA Office for Coastal Management; and Tyler Soleau, Assistant Director, Massachusetts Office of Coastal Zone Management. The support of the Illinois Coastal Management Program staff was crucial in conducting the evaluation, and their support is most gratefully acknowledged.

NOAA sent a notification of the scheduled evaluation to Colleen Callahan, Director, Illinois Department of Natural Resources, on March 24, 2020, and published a notice of “Intent to Evaluate” in the *Federal Register* on September 11, 2020. The Illinois Coastal Management Program posted a notice of the public meeting and opportunity to comment on the Illinois Department of Natural Resources’ website on September 16, 2020.

The evaluation process included a review of annual federal financial assistance award reports, Section 309 Assessments, and information provided by the programs documenting how they are implementing their programs and addressing the programmatic requirements of the Coastal Zone Management Act. The review also included a survey of stakeholders, which helped identify three target areas for the evaluation: the blue economy, including working waterfronts and public access; resilience to coastal hazards; and program administration. A virtual site visit was conducted October 26-30, 2020, and the evaluation team held meetings with staff members and group discussions with stakeholders and program staff members about the target areas. In addition, a virtual public meeting was held on October 28, 2020 to provide an opportunity for members of the public to express their opinions about the implementation of the coastal program.

Stakeholders and members of the public were given the opportunity to provide written comments via email or U.S. mail through November 6, 2020. Several written comments were received from interested parties (see Appendix A). The Office for Coastal Management then developed draft evaluation findings, which were provided to the coastal program for review. The coastal program’s comments will be considered in drafting the final evaluation findings.

Evaluation findings for all coastal programs highlight the coastal program's accomplishments in the target areas and include recommendations that are of two types:

Necessary Actions address programmatic requirements of the implementing regulations of the Coastal Zone Management Act (CZMA) and of the state coastal program approved by NOAA. These must be carried out by the dates specified. Failure to address necessary actions may result in a future finding of non-adherence and the invoking of interim sanctions, as specified in CZMA §312(c).

Recommendations are actions that the office believes would improve the program, but which are not mandatory. The state is expected to have considered the recommendations by the time of the next evaluation or by the dates specified.

Evaluation Findings

The Illinois Coastal Management Program is led by the Illinois Department of Natural Resources. The program focuses on the Lake Michigan watershed and shorelines. Although the coastline is only 68 miles in length, the population of the two counties with Lake Michigan shoreline—Lake and Cook—is nearly six million.

The Lake Michigan shoreline is very highly developed, with the only significant stretch of undeveloped waterfront being Illinois Beach State Park in northern Lake County near the Wisconsin border. The coastal management program has devoted a great deal of attention to helping the communities along the North Shore address erosion and sand management issues and the impacts to the small remaining areas of wildlife habitat. Along the South Shore, the program has worked with disadvantaged communities to improve access to recreational and employment opportunities.

One of the key elements of the coastal management program is the connection between the natural resource, economic development, and environmental protection goals of the state and the region. In 2013, the Illinois Lake Michigan Implementation Plan was adopted as the principal guiding document of the program. This plan is closely tied to the U.S. Environmental Protection Agency's (USEPA's) Lakewide Action and Management Plans, which seek to ensure that land use, recreation, and economic development are all sustainable and supportive of a healthy ecosystem. By tying the coastal management program to these objectives, the state has been able to participate in and receive funds from the Great Lakes Restoration Initiative, which has had a multiplier effect on NOAA coastal zone management funding and coastal program impacts on the ground.

Target Area 1: The Blue Economy

Adaptive reuse of historical industrial areas and access to coastal waters have been key focus areas for the Illinois Coastal Management Program throughout the program's existence. These topics have been rated as a high priority in the two most recent Section 309 assessments and strategies.

Examples of Key Efforts

The Illinois Coastal Management Program serves as the state lead for participating in the USEPA's Great Lakes Restoration Initiative, a partnership that has brought millions of dollars to the state for restoration activities. The program has been active in the development of the Lake Michigan Action and Management Plan as well as in leading efforts to address the contamination issues in Waukegan Harbor, Illinois' only area of concern for beneficial use impairment identified by the International Joint Commission, USEPA, and Illinois EPA under the Great Lakes Water Quality Agreement of 1987. The coastal program has worked closely with the USEPA to ensure that all the necessary management actions to remove the listing as an

area of concern are met. These efforts are currently focused on monitoring the one remaining use impairment, restriction on fish and wildlife consumption. The participation of the coastal program in these efforts is seen as a major contribution to this success.

Accomplishment: The Illinois Coastal Management Program has facilitated significant progress in removing beneficial use impairments in the Waukegan Harbor Area of Concern.

In addition to leading the effort to improve water quality and delist the area of concern, the coastal program has been involved in several other efforts in Waukegan and at nearby Illinois Beach State Park, where the coastal program supported habitat planning initiatives and staff successfully upgraded interpretive materials for the visitor's center. Coastal program staff also served as the convener for the development of a master plan for the Waukegan Port District. The evaluation team learned that this has been crucial to the success of the planning efforts, as the coastal program was able to bring together key stakeholders to support the process. This convening role was seen by interested parties as essential to the development and implementation of the plan.

Public access to the lakeshore is also a key element of advancing the blue economy in Illinois. The evaluation team learned that the coastal management program has focused attention on beach access management and water safety issues, an area not addressed by other state agencies. In the Waukegan area, a number of coastal program projects have combined to improve the ability of local residents to enjoy waterfront activities. Examples include a new ADA-compliant kayak access point constructed at Waukegan Harbor and the promotion and improvement of the Lake Michigan Water Trail connecting North Shore communities. Another project helped the Chicago Park District redesign trails at Montrose Point to better protect habitat for the piping plover, helping to pursue both threatened and endangered species habitat and access goals. Public access has also been an important element of the efforts to improve communities in the southern part of the coastal area stretching from Downtown Chicago to the Indiana border.

The Millennium Reserve was an initiative focused on natural area restoration, historic preservation, public access and recreation, and workforce development. In 2011, shortly after the creation of the Illinois Coastal Management Program, it was tasked with managing this initiative focused on the long-neglected area along the Calumet and Little Calumet Rivers on the South Side of Chicago. Many communities in the region are lower income, with primarily minority populations. Although these communities have a predominance of industrial and commercial land uses, they struggle with a lack of employment opportunities, under-resourced institutions, and environmental injustice.

Under coastal program leadership and funding, the Millennium Reserve accomplished a number of key objectives, including cleanup of environmental problems, restoring natural areas, and opening up public access to the former brownfields. These efforts were undertaken in collaboration with a number of local and state agencies as well as nongovernmental partners such as the Field Museum, the Nature Conservancy, and the A. Philip Randolph Pullman Porter

Museum. One of the major objectives of the initiative was providing access to natural, cultural, and recreational resources for the underserved communities in the region.

In 2016, a governor's executive order encouraged the alliance of nongovernmental groups to become an independent bi-state organization to continue the efforts of the Millennium Reserve. Coastal management program staff led a strategic planning effort involving more than 70 stakeholder groups from both Illinois and Indiana that facilitated the transition of the group to become the Calumet Collaborative. Staff continued to assist the new organization by serving on the initial board of directors and leading the revitalized Calumet Collaborative Illinois State Agency Task Force. The Calumet Collaborative continues the mission of the original initiative to improve the quality of life for residents in the watershed of the Calumet River while ensuring environmental, economic, and community equity.

Accomplishment: The Illinois Coastal Management Program provided essential leadership for the development of the Millennium Reserve as well as the transition of the initiative to the Calumet Collaborative, a bi-state nongovernmental organization.

In a separate effort focused on the Calumet region, the coastal management program recognized opportunities to help the Illinois International Port District to revitalize. Coastal program staff helped the port become more aware of its impact on both the environment and the economy of the neighboring communities. The program provided grant funding for the port to expand its capacity to plan for the future in concert with the local community. This work was essential in helping bring a number of state and local agencies together with community members to develop a new master plan. Coastal management program planning grants led to infrastructure improvements that have had positive impacts on the community, including roadway improvements and a multi-use path. This funding has led to the investment of more than \$17 million from outside sources.

The coastal program worked with the Illinois Conservation Foundation to support the development of a community-driven enhancement plan for the William Powers State Recreation Area located in the Calumet area. The park is located on Wolf Lake, a natural water body in a former heavy-industrial area that spans the Indiana border and the Chicago Skyway highway (Interstate 90). The park is popular with fishermen but has had little access to the surrounding neighborhoods. The goal of the enhancement plan is to make the facility a destination park that will serve both the local neighborhoods and the broader Calumet region. Planned improvements include habitat restoration, improved bicycle access, an outdoor environmental learning center, and green infrastructure.

The coastal management program also provided support and staffing for two projects that convert obsolete rail lines into multiuse trails. The Cal-Sag Trail eventually will run 26 miles and connect disadvantaged communities to five regional trails near marinas and nature preserves. The 7.6-mile Major Taylor Trail links several Chicago Southwest-side neighborhoods. It is named after 19th century African American cyclist Marshall "Major" Taylor, who set several world records.

Accomplishment: The Illinois Coastal Management Program has successfully worked with communities to improve the environmental and economic health of underserved populations in the coastal area.

Target Area 2: Resilience to Coastal Hazards

In the 2016 Section 309 Assessment and Strategy, the Illinois Coastal Management Program included erosion occurring along the shoreline of Lake Michigan, in the ravine systems along the lakefront, and in the Waukegan River as the basis for defining areas of particular concern. Resilience to these coastal hazards and climate change has become an increasing problem as lake levels have risen and extreme events become more frequent. While flooding is also recognized as a coastal hazard, the Technical Advisory Committee felt that coastal erosion was more urgent as there is no other entity in the state addressing the issue, so that has become the initial focus.

Examples of Key Efforts

In 2014, the coastal management program created the Sand Management Working Group, a collaborative group of more than 40 local, state, and federal representatives to focus on shoreline management needs and solutions in the northern reaches of the coastal area. Phase 2 of the working group revised the focus to the entire Illinois Lake Michigan coastline. More than 35 agencies and organizations became involved, and, while the focus remained on public lands, private landowners became involved to help identify problems and potential projects for the public shorelines. In 2018, the working group organized a collaborative proposal from a number of communities for a pilot project to restore beaches using dredged material that was approved by the U.S. Army Corps of Engineers. The coastal management program continues to facilitate the working group, which has continued to meet regularly to bring about improvements to policy, permitting, on-the-ground projects, monitoring, and outreach.

The coastal management program also initiated efforts to better understand the impacts of erosion on critical habitats. This project, in coordination with the NOAA Office for Coastal Management and the Illinois State Geological Survey, sought to better understand conditions at Illinois Beach State Park. The park extends for more than six miles along the shoreline and is the only beach ridge shoreline remaining in the state. The ridge is home to more than 650 plant species, but has seen extensive habitat loss with the recent fluctuation of lake levels. The coastal program partnered with landscape design professionals to develop a pilot passive sediment management project to protect the shoreline and reduce wave energy at the threatened wetland site. The project was jointly funded with the Great Lakes Restoration Initiative and the Great Lakes Protection Fund. The project has moved to the permitting phase and the U.S. Army Corps of Engineers will begin installation in the summer of 2021. The coastal program will work with NOAA and the Illinois State Geological Survey to monitor the results of this pilot project.

The northern part of the coastal area is also home to more than 40 ravines where inland streams intersect with the coast. These ravines do not discharge directly into the lake, but rather discharge to the beach ridge wetland complex. These unique V-shaped valleys, which cover more than 1,000 acres in two counties and ten municipalities, are a point of convergence for a number of coastal issues, including bank erosion, sedimentation, stormwater management, flooding, development pressures, and habitat preservation. The ownership of many of the ravines is a mix of public, private, and nongovernmental organizations, making resource management difficult. The coastal program is attempting to address ravine management through on-the-ground projects such as the Lake Forest Cemetery Ravine Restoration Project in 2015. Current efforts focus on assessing the current condition and vulnerability of the ravines, identifying existing gaps in ravine management, and prioritizing them for stormwater and erosion control efforts. An outreach and education program is proposed to follow the assessment phase.

Accomplishment: The Illinois Coastal Management Program has successfully created ongoing intergovernmental partnerships to address coastal hazards along the Lake Michigan shoreline.

Flooding from rain events is also a significant problem due to the dense patterns of development throughout the coastal area. The Illinois Coastal Management Program has worked to address this problem in a number of ways, ranging from public outreach and education to on-the-ground projects. An example of stormwater education is work that the program has done with Chicago Public Schools through an effort called Calumet Is My Back Yard. This multi-year effort has focused on training teachers to work with their students in specific highly impacted areas.

The coastal program has funded a number of pilot projects to encourage green infrastructure projects throughout the coastal area, and especially in underserved communities. An innovative approach has been to conduct one-day trainings on green infrastructure maintenance to create an employment path in these communities.

Flooding and stormwater management was also identified as a key element of the Millennium Reserve, where the program partnered with the Metropolitan Planning Council to create the Calumet Stormwater Collaborative. The collaborative is a group of federal, state, and local agencies and nongovernmental organizations brought together to coordinate across jurisdictions to solve urban flooding and stormwater challenges. Coastal program staff continue to advise this active group as well as fund on-the-ground projects.

Another hazard that is being addressed by the coastal program in innovative ways is hazardous currents. The approach has been to work with other coastal management programs and Sea Grant offices in the Great Lakes states. Using information compiled through the NOAA Coastal Storms Program, the Illinois Coastal Management Program has provided educational materials as well as hazardous-current signs and beach safety and rescue equipment to local communities. The program also convenes an annual meeting of local beach managers to discuss

latest information. Community representatives advised the evaluation team that this assistance has been crucial to their water safety efforts.

Target Area 3: Program Administration

One of the strong attributes of the Illinois Coastal Management Program is a dedicated staff that has developed strong relationships with local and regional governments and organizations in the coastal area. The program has also provided funding opportunities to partners that have provided plans that have attracted very significant investments from federal, state, and regional sources.

Examples of Key Efforts

Approximately one-half of the funds received under the coastal management cooperative agreement between NOAA and the State of Illinois is passed through as grants to a variety of partners, including local governments, educational institutions, and nongovernmental organizations. This grant funding has created a number of important partnerships for the coastal management program and seen a number of important achievements. Program staff members earned praise from several partners for their guidance and willingness to assist with the application process.

Accomplishment: Over the course of the evaluation period the Illinois Coastal Management Program has not only developed a new grant program but has worked to ensure that the application process is open to all eligible partners.

Because external funding plays such an important role in program implementation, it is important that the partners be well integrated into the administrative processes. As mentioned above, the staff has been very supportive in the development of applications for funding. Unfortunately, the timing of the application process has varied and grant applicants expressed their wish that the grant application process be more predictable so that their organizations could budget accordingly.

Another issue identified is that the program has not been successful in ensuring that payments for work completed flow smoothly to the partners. Since the start of the competitive grants program in 2015, coastal management program grant recipients have expressed concern that they have had difficulties receiving timely payments from the Department of Natural Resources. The delayed payments were especially troublesome for small nongovernmental organizations, including those in the Calumet region. The delay in payment has caused several past grant recipients to no longer participate in the grants program.

The evaluation team also noted two additional areas where timeliness is an issue. On numerous occasions, the coastal management program has failed to submit progress reports for financial assistance awards to NOAA in a timely manner, causing notices of enforcement actions to be

issued by the NOAA Grants Management Division. These delays cause additional workloads for staff in both the Illinois Department of Natural Resources and NOAA Office for Coastal Management. The program has also had difficulty spending the entire grant within the grant period.

Necessary Action: The Illinois Department of Natural Resources must submit a report to the NOAA Office for Coastal Management addressing the delay of grant payments to partners, of meeting federal financial award expenditure timelines, and of progress reporting by the Illinois Coastal Management Program by September 30, 2021. The report shall analyze the causes of the problems and propose solutions to be implemented by December 31, 2021.

The Illinois Coastal Management Program is a major portal for the Department of Natural Resources in the Chicago area, serving as an interface with NOAA and other federal agencies, local governments, and other valued partners of the department with whom the other divisions may not interact. As a part of this evaluation we learned of a number of instances where major projects with significant coastal impacts were initiated by Department of Natural Resources divisions without consultation with the coastal management program. A more routine communication strategy within the department could avoid duplication of effort and unnecessary confusion by valued partners.

The Illinois Coastal Management Program adopted a new strategic plan for the period 2019 through 2023. This plan lays out a number of goals that will help steer the program to meet the overall objective of “protecting and enhancing the environmental, economic, and social value of Illinois’ Great Lakes coastal region.” This document could serve as a very useful tool for the program and the residents of the region. Unfortunately, this plan does not speak to collaboration with the other divisions within the Department of Natural Resources, nor does it build upon their strengths.

Recommendation: The NOAA Office for Coastal Management recommends that the Illinois Department of Natural Resources create better communication channels between internal divisions and external partners to increase collaboration and reduce confusion related to projects in the coastal area.

The many stakeholders and partners who participated in the evaluation expressed their views that one of the best things about the program is the staff. They find them to be highly qualified, interested in helping to solve problems, and available whenever anyone needs them. The program has been fortunate to create a highly qualified team with a number of junior-level positions hired under contract.

Because the program has been unable to hire applicants with the necessary skills and abilities required for program implementation through the civil service system, the program has turned to the University of Illinois’ Prairie Research Institute to provide qualified employees under contract through an intergovernmental agreement. This method has provided staff members with the appropriate qualifications, as the job descriptions can be modified to reflect specific

needs for specific projects. Unfortunately, filling staff needs under a contract has created a bifurcated staff where some employees work under civil service guidelines at certain pay scales and employees doing similar work are seen as temporary contract workers with different pay rates and benefits. This staffing arrangement has also limited staff members with applicable expertise from being involved with certain projects because of the terms of their contract.

There has been fairly regular turnover in the contractual staff, leaving partners to comment on the frequent need to brief new staff on local issues and personalities. The evaluation team learned that much of the staff turnover has been due to lower salaries and a lack of benefits for contract employees. While we recognize that the relationship with the Prairie Research Institute has been successful in providing talented young professionals, we do not see this arrangement providing for a sustainable long-term staff. In addition, several state positions have been vacant for a considerable period of time.

One of the problems related to finding and keeping highly qualified staff has been the problem of inappropriate job classifications in the state civil service system. The initial positions were originally created for the Illinois Natural Heritage Program, classifications that are inappropriate for many coastal management duties. The initial staff for the program met those heritage program requirements and found that they had a steep learning curve working with partners on coastal management projects. In a recent incident, an applicant for a state coastal program position was found to not meet education criteria despite having a master's degree in coastal management.

Similar problems have been faced by other states as they created coastal management programs, as coastal management is a relatively new field that requires a variety of skill sets. The coastal management program, as described elsewhere in this evaluation, works with communities on a variety of issues from natural and cultural resource protection to economic development planning. A key skill set is the ability to form working partnerships with people from a variety of agencies, organizations, and neighborhoods.

When NOAA approved the coastal management program in 2012, the staff positions were framed as full-time state positions. We believe that having a staff composed primarily of state employees would lead to both a better continuity of operations and improved relationships with the program's many partners.

After eight years of existence, the program seems to be in a good place to adequately describe duties and responsibilities to design new job descriptions. Classifications such as coastal management specialist, coastal geologist, and coastal engineer are used in other states and seem appropriate for the coastal management program. To create these positions, the program must work with the Illinois Department of Central Management Services, which is responsible for both the creation of position descriptions and certifying applicants as meeting position requirements. The coastal management program must work through the Department of Natural Resources to make any requests to the Department of Central Management Services.

Recommendation: The NOAA Office for Coastal Management recommends that the Illinois Department of Natural Resources coordinate with the Department of Central Management Services to establish appropriate position descriptions and classifications for the Illinois Coastal Management Program.

The federally approved Illinois Coastal Management Program described both a Technical Advisory Committee, composed of subject matter experts with a key role in project application review, and a Coastal Advisory Group, composed of coastal area citizens, both of which would provide input on broader policy issues. In the program document the Technical Advisory Committee was intended to meet twice per year, and the Coastal Advisory Group was to meet annually. These groups are currently convened on an ad-hoc basis and have not met frequently due to staff shortages and the inability to successfully prepare materials and brief the members. These groups last convened in 2018 to help determine program priorities. The program has attempted to use other methods to ensure community engagement, such as a stakeholder survey in 2020 to gain input to help guide revisions to the state's Section 309 assessment and strategy.

During the evaluation, several program partners commented that they believed that a reconstituted Coastal Advisory Group could be beneficial to the program for a number of reasons. Keeping coastal communities informed of program achievements could lead to more local support as well as additional insights into community needs. An open forum could also encourage robust discussions with a number of viewpoints. This latter point seems especially important due to the breadth of economic disparity across the Illinois coastal area. A Coastal Advisory Group attuned to justice, equity, and inclusion would also send an important message to residents of coastal communities.

Recommendation: The NOAA Office for Coastal Management recommends that the Illinois Coastal Management Program reconstitute its Technical Advisory Committee and Coastal Advisory Group to provide additional insights into community needs and to help track progress in meeting the program's strategic objectives.

Implementation of Coastal Zone Management Program General Requirements

Section 6217 of the Coastal Zone Act Reauthorization Amendments requires Illinois, like all coastal states participating in the National Coastal Zone Management Program, to develop a coastal nonpoint program to control polluted runoff to coastal waters. NOAA jointly administers the Coastal Nonpoint Program with the U.S. Environmental Protection Agency (USEPA). NOAA and the USEPA approved the Illinois Coastal Nonpoint Program, subject to certain conditions, in 2016.

Since then, the state has been working closely with NOAA and USEPA to address those conditions. Outcomes of their efforts include improved regional collaboration on stormwater issues, increased cooperation and focus on the land uses that are associated with nonpoint source pollution, and incorporation of the coastal nonpoint program into local watershed plans.

At the time of the site visit, the state had submitted everything they believed was needed to address the conditions on their program. NOAA and USEPA are currently completing their review of Illinois' program and preparing a proposed decision on whether the state has satisfied all conditions of approval that the federal agencies placed on its program in 2016. NOAA and USEPA plan to announce the proposed decision in the *Federal Register* for public comment before making a final decision.

Accomplishment: The Illinois Coastal Management Program has addressed the remaining conditions and submitted the required documentation for approval of the Illinois Coastal Nonpoint Program.

Another requirement of the Coastal Zone Management Act is for participating states to conduct federal consistency determinations in a timely manner. The Illinois Coastal Management Program has an agreement with the Office of Water Resources to conduct consistency determinations. The process is run efficiently but with little interaction with the coastal management program. Increased communication between the two offices could help to prevent future conflicts among activities in the coastal area.

Recommendation: The NOAA Office for Coastal Management recommends that the Illinois Department of Natural Resources examine ways to ensure active participation in the federal consistency process by the Illinois Coastal Management Program.

Evaluation Metrics

Beginning in 2012, state coastal management programs began tracking their success by tracking three activities specific to their programs. The evaluation metrics include a five-year target and provide a quantitative reference for each program about how well it is meeting the goals and objectives it has identified as important to the program.

2012–2017 Metric 1: Green Infrastructure for Storm Water Management

Goal: Increase the effective use of Green Infrastructure to reduce stormwater impacts throughout the Illinois Coastal Zone.

Objective: By prioritizing and pursuing green infrastructure projects with local partners, we will see an increase in groundwater recharge, decrease in local flooding, improvement in water quality, and an overall increase in coastal resilience throughout the Illinois Coastal Management Zone.

Strategy: Storm water management is a major concern along the Illinois Lake Michigan shoreline. As storms become larger and more erratic due to climate change, storm water management is projected to become an even greater problem. Reducing storm water discharge and enabling precipitation to infiltrate where it falls through the use of natural and engineered systems has the potential to improve water quality, reduce local flooding, and increase groundwater recharge. Green infrastructure installations for storm water management include everything from bioswales to green roofs and from rain gardens to permeable pavement. The Illinois Coastal Management Program intends to promote, provide technical assistance, and fund the installation of green infrastructure.

The approach for meeting this goal includes collaboration with governmental partners, nonprofits and stakeholders to identify priority locations for green infrastructure installations; and leveraging multiple funding sources to install top priority projects with maximum coastal benefit.

The number of green infrastructure projects in the Coastal Zone designed to infiltrate, filter, or mitigate storm water will be tracked. This will include both projects directly supported the Illinois Coastal Management Program (ICMP) as well as other projects prioritized and promoted with ICMP's help but implemented/funded by other partners.

Performance Measure: Number of green infrastructure projects completed with funding and/or technical assistance from ICMP.

Target: Between 2013 and 2017, 10 green infrastructure projects completed with funding and or technical assistance from ICMP.

Year 1: N/A

Year 2: 0

Year 3: 2

Year 4: 8

Year 5: 1

Cumulative Data: 11 (110 percent)

Discussion: The program exceeded its goal for implementing green infrastructure.

2012–2017 Metric 2: Terrestrial Invasive Species Management and Habitat Restoration

Goal: Support the integrity of biological communities by preventing and controlling invasive species throughout the Illinois Coastal Zone, and increasing the resilience of local habitats through restoration activities to strengthen native natural communities.

Objectives: Existing populations of major invasive plants will be reduced on priority conservation lands; new infestations will be caught and controlled or eliminated before they can become permanently established; overall habitat quality will improve in Coastal Zone natural habitats, leading to greater resilience in populations of native species.

Strategy: Invasive species threaten the health and ecological integrity of biotic communities throughout the Illinois Coastal Zone, which suffers from a relatively small remaining proportion of natural habitat. Reduced biodiversity due to invasive species decreases ecosystem resilience. Threatened and endangered species are particularly vulnerable. A comprehensive program of invasive species control and prevention has the potential to significantly improve the quality of aquatic habitats and open space within our region.

ICMP will partner with local coalitions representing major managers of conservation lands, particularly the regional Cooperative Weed Management Area, to identify priority projects that will reduce the impact and spread of invasive species across the Coastal Zone. We will work collaboratively to support and/or establish projects that advance a region-wide strategy for habitat restoration. Effective restoration may at times require multiple treatments of the same acreage, for example removal of invasive plants followed by prescribed burning. Therefore, some acreage may be counted more than once due to multiple treatments over the evaluation period.

Performance Measure: The number of acres of Coastal Zone natural habitats on which restoration and invasive species prevention and removal projects have occurred as a result of ICMP funding and/or staff resources.

Target: Between 2013 and 2017, 180 acres of Coastal Zone natural habitats on which restoration and invasive species prevention and removal projects have occurred as a result of ICMP funding and/or technical assistance.

Year 1: N/A

Year 2: 387.64

Year 3: 130.31

Year 4: 180.63

Year 5: 136.4

Cumulative Data: 835 (463 percent)

Discussion: Being a new program, predictions were low for what the program could achieve related to habitat restoration. The program far exceeded its goal.

2012–2017 Metric 3: Lake Michigan Coastal Interpretive Program

Goal: Raise awareness among the public in Illinois Coastal Zone communities about the value of coastal resources, the problems and challenges they face, and actions that individuals and groups can take to improve the coast.

Objectives: Through both CZM funding and direct involvement of ICMP staff, we will lead, fund and promote a range of activities including hikes, public and classroom presentations, events, and the creation of materials including publications, interpretive displays, mobile phone apps, posters, and curricula materials. All materials and activities will be linked to the Illinois Lake Michigan Implementation Plan (ILMIP) and the ICMP wiki.

Strategy: Coastal resilience and sustainability is only possible when communities and individuals understand the value of coastal resources and the problems and challenges to maintaining these resources for the full complement of basic uses and needs. The interpretive program will raise awareness among the public of these valuable resources, issues and potential solutions.

Public outreach will involve a multi-tactic approach including staffed interpretive centers, published materials, presentations, and partnerships with other content providers including non-profits and other divisions of state and local government.

Performance Measure: Number of individuals reached by ICMP through visitation to staffed interpretive centers and attendance at presentations or events on coastal management issues supported by ICMP staff and/or funds.

Target: Between 2013 and 2017, 5,000 individuals reached by ICMP through visitation to staffed interpretive centers and attendance at presentations or events on coastal management issues supported by ICMP staff and/or funds.

Year 1: N/A

Year 2: 0

Year 3: 29,303

Year 4: 9,740

Year 5: 8,831

Cumulative Data: 47,874 (957 percent)

Discussion: As a new program, the ability to interact with the public was seriously underestimated when creating this goal. The coastal management program's outreach efforts were very successful.

2018–2023 Metric 1: Coastal Access

Goal: Support and promote sustainable coastal access, tourism and recreation opportunities
Objective: By 2023, increase public access through enhancing public access sites in the Illinois Coastal Area.

Strategy: Although Illinois already has many public parks and access areas on Lake Michigan, some remain underdeveloped, underutilized or in need of access improvements. Many economically disadvantaged areas, especially those with significant communities of color, are disconnected from coastal resources and recreational opportunities, or face barriers to accessing and enjoying those resources. And some coastal areas are ill-equipped to accommodate people with limited mobility. There is a significant disparity in racial and socioeconomic access to and participation in coastal recreation. Illinois' Coastal Program believes that connecting the disconnected to our coastal areas and resources is a first critical step to building appreciation, respect and ultimately stewardship responsibility for these shared resources.

For that reason, our strategy is to identify public access needs through work with partners and the competitive grant program. We will provide technical support, coordination, communication and funding to improve overall accessibility to coastal areas. In addition, we will improve amenities, recreational options and opportunities at coastal sites in Illinois. We plan to consider all reasonable opportunities provide and improve access and opportunities but will prioritize underdeveloped locations that serve under-resourced or disenfranchised communities, and people with mobility challenges.

Performance Measure: Between 2018 and 2023, number of existing public access sites enhanced with assistance from CZM funding or staff.

Target: Between 2018 and 2023, 15 public access sites will be enhanced with assistance from CZM funding or staff.

Year 1: 6

Year 2: 4

Cumulative Data: 10 (66 percent) in first two years of the five year target period.

Discussion: The program has had significant success in meeting this goal.

2018–2023 Metric 2: Coastal Habitat

Goal: Protect and improve coastal habitats for the species that use them, with a focus on priority resources.

Objective: Identify and improve high priority and strategic habitat types through planning, technical assistance, staff support, and funding.

Strategy: The Illinois Coastal Management Program has a significant role in coastal habitat protection and management as identified through our strategic plan. We have identified priority objectives that include: coastal wetlands; public-owned and accessible coastal parks; ravines, migratory bird stopover sites and pollinator habitat. The number of acres under restoration is less than previous years because CMP had several other grants that were supporting additional restoration work. These grants have now ended, and we no longer have the funding from that source. In addition, the Illinois Coastal area is very urbanized and a majority of restoration projects are relatively small acreages, though highly important in the area. And with the increased complexity and timeframes for 306A and NEPA review, individual projects take longer and require more effort.

Through our coordination and work with partners' organizations and key land managers, CMP will identify specific needs and opportunities for CMP assistance, and then cultivate and

support strategic habitat restoration projects through grants, contracts, technical assistance and coordination.

In the case of coastal wetlands, we plan to use GIS imagery and on-the-ground assessment to identify high-priority coastal wetlands for restoration action. In addition, current research and monitoring on shoreline erosion issues will be used to identify vulnerable wetlands and other coastal habitat types for habitat management and planning projects.

Performance Measure: Between 2018 and 2023, number of acres of coastal habitat under restoration with assistance from CZM funding or staff, all categories.

Target: Between 2018 and 2023, 700 acres of coastal habitat will be under restoration with assistance from CZM funding or staff, all categories.

Year 1: 376.9 acres

Year 2: 15.5 acres

Cumulative Data: 392.4 acres (56 percent) in the first two years of the five year target period.

Discussion: The program has had significant success in meeting this goal.

2018–2023 Metric 3: Coastal Hazards

Goal: Increase communities' capacity to protect coastal natural, cultural, and economic resources

Objective: Increase the capacity of coastal communities to protect coastal infrastructure, shorelines and community resources to ensure the long-term sustainability.

Strategy: The Lake Michigan shoreline is a dynamic system. Coastal Hazards such as shoreline erosion, sand accretion, stormwater volume and flooding pose major challenges. The health and vitality of coastal communities requires sustainable solutions to coastal challenges that balance the needs of shoreline residents, recreational users, business and nature. There are several strategies that CMP will use to achieve our goal and objective.

1. CMP will offer competitive grants to Coastal communities and organizations to assist them in development of sustainable solutions that mitigate coastal hazards. These projects will address raising awareness of coastal hazards, planning long-term solutions, and increasing coordination and collaboration among communities to address regional hazards. All projects that are funded must show clear connection and make progress toward these goals. Examples of grant projects include but are not limited to outreach, education and training; building partnership coalitions;

hazard vulnerability assessment and planning; and development of tools or resources to improve decision-making.

2. CMP will work with Federal, State and local agencies, researchers, and coastal communities to develop sustainable strategies to address shoreline erosion, accretion, and sand management. This work will include identifying research and data needs; permitting and regulatory challenges to better management; high priority projects; training, education and outreach opportunities. CMP plans to work with partners on this high priority initiative to address the needs and challenges that are identified in order to reduce hazards and improve management of coastal assets. Expected products and outcomes include assessments, monitoring data, research projects, policy analysis, project design and development, educational material and policy changes.

3. CMP will work with federal, state, and local agencies to improve and coordinate Great Lakes coastal resilience and hazard preparedness. Numerous ongoing efforts aim to address Great Lakes coastal resilience through research, assessments, coordination, trainings, best practices, policy reviews and on the ground projects. CMP will identify key efforts for our active participation to ensure Illinois coastal representation in, and access to products, projects, and planning. We expect that our participation in these efforts will result in projects, policies, tools, or resources that will benefit Illinois' coastal communities.

Illinois coastal hazards considered for metrics: flooding, shoreline erosion, storm damage, infrastructure damage, lake levels, bluff erosion/failure, navigation (dredging-shoaling), in-water structures, and toxic or polluted runoff.

Over the 5 years, it is anticipated that a) 2 state-level policies and plans; b) 10 local-level policies and plans; c) 5 projects completed at the state-level; and d) 10 projects completed at the local-level to reduce future damage from coastal hazards with assistance from CZM funding or staff.

Performance Measure: Between 2018 and 2023, number of a) state-level policies and plans; b) local-level policies and plans; c) projects completed at the state-level; and d) projects completed at the local-level to reduce future damage from coastal hazards with assistance from CZM funding or staff.

Target: Between 2018 and 2023, 27 a) state-level policies and plans; b) local-level policies and plans; c) projects completed at the state-level; and d) projects completed at the local-level to reduce future damage from coastal hazards with assistance from CZM funding or staff.

Year 1: 2

Year 2: 3

Cumulative Data: 5 (18.5 percent)

Discussion: The Illinois Coastal Management Program is making progress toward meeting the target. Because this is a relatively new effort, the pace of plan and ordinance completion should pick up over the five-year cycle.

Conclusion

For the reasons stated herein, I find that the State of Illinois Department of Natural Resources is successfully implementing and enforcing its federally approved coastal management program, adhering to the terms of federal financial assistance awards, and addressing coastal management needs identified in section 303(2)(A) through (K) of the Coastal Zone Management Act in the operation of its approved Illinois Coastal Management Program.

These evaluation findings contain four recommendations and one necessary action. Necessary actions must be addressed as stated in the text of this document. The recommendations must be considered before the next regularly scheduled program evaluation, but they are not mandatory at this time. Program recommendations that must be repeated in subsequent evaluations may be elevated to necessary actions.

This is a programmatic evaluation of the Illinois Coastal Management Program that may have implications regarding the state's financial assistance awards. However, it does not make any judgment about or replace any financial audits.

signed by Keelin Kuipers
Keelin S. Kuipers
Deputy Director
NOAA Office for Coastal Management

dated May 20, 2021
Date

Appendix A: Response to Written Comments

Pat DiPersio, Community Development Director for the Village of Winthrop Harbor

I was involved with the program since inception when I was asked to offer input on the importance of the lakefront to economic development. Then, as now, I felt that the lakefront was nothing short of paramount to any hope of revitalizing the region's economic opportunities, albeit in a way far different than in the past. In short we formulated plans around the notion of providing access to the lakefront for recreation and educational purposes as a way to increase visitation to the area. Visitation that could then be converted to economic value. We feel that in finding a way to extract value from its use we would in turn create a reason for its conservation. In part at least, the basis of these ideas were incorporated into the Coastal Management Plan, after which we went about trying to implement change.

We found exceptionally smart, willing and motivated partners within the Coastal Program itself. However, as an arm of the IDNR it became clear over time that they did not hold the authority to see all of our efforts come to fruition. We worked with the Coastal Program to develop a beach maintenance plan for the beach at North Point Marina that would see a public beach that was closed more than any other in Illinois returned to a key component of a plan to attract visitation. Unfortunately the IDRR has been unwilling to implement the plan even though there is in place funding for the suggestions in the plan.

We also worked with the Coastal Program, along with many other stakeholders, on a regional, interconnected, trail plan intended to connect the region to the lakefront. Again, we encountered continued resistance from the IDNR regarding the use of the state park land for trails. The same occurred when we worked with Open Lands and the Coastal Program on the Illinois Water Trail; additional connections within the IDNR controlled property along the lakefront we were told, were unlikely to occur.

Lastly, I would like to express continued concern over the ongoing erosion of the lakefront here in northern Illinois. As we continue to study the problem there is less and less shoreline to save.

I would also say that if it were not for the Coastal Management Program I'm not sure any of the issues I raised here today would even be talked about. The work they are trying to do, they want to do, remains important.

Response: The evaluation team appreciates these comments, has considered them in preparing these findings, and has shared them with the Illinois Coastal Management Program for their information. Under Target Area 3: Program Administration, we have recommended that the Illinois Department of Natural Resources create better communication channels between internal divisions and external partners to increase collaboration and decrease confusion related to projects in the coastal area.

J. B. Schreiber, Chair – Waukegan Harbor Citizens' Advisory Group

This brief overview of the Illinois Coastal Zone's first eight years of operation, as related to the Waukegan Harbor Citizens' Advisory Group (CAG) mission, is respectfully submitted by the Waukegan Harbor CAG to the National Oceanic Atmospheric Administration (NOAA). We are most appreciative of this opportunity provided by NOAA to provide our comments in writing, and look forward to continuing to cooperatively work with USEPA, NOAA, USACE, IEPA, IDNR Coastal Zone, IDNR Natural Heritage and the Great Lakes National Program Office to complete the mission of remediation and restoration of the Waukegan Harbor Area of Concern and Extended Area of Concern.

In 1981, prompted by the discovery of high levels of polychlorinated biphenyls (PCBs) in harbor sediments, Waukegan Harbor was designated as a Superfund site and independently named as one of 43 Areas of Concern* (AOC) on the Great Lakes by the International Joint Commission, USEPA and IEPA. The harbor was identified as an AOC using protocols developed by the United States and Canada under the Great Lakes Water Quality Agreement of 1987. The Waukegan Harbor AOC was identified to have 6 Beneficial Use Impairments. The impairments are required to be remedied, then reviewed and approved by the USEPA Great Lakes Program Office and ultimately by the International Joint Commission before an AOC can be designated as an Area of Recovery.

The Waukegan Harbor Citizens Advisory Group (CAG) was formed by the USEPA and the Illinois Environmental Protection Agency (IEPA) in August of 1990 to assume a leadership role in developing a remedial action plan (RAP) for the Waukegan Harbor AOC.

The membership of the Waukegan Harbor CAG is representative of diverse community interests. CAG meetings provide a public forum for representatives from business, education, government, industry, environment, civic and recreation interests plus the local citizenry to present and discuss their needs and concerns related to the decision-making process at the Waukegan Harbor AOC. The CAG has actively and energetically spearheaded the implementation of the RAP attending to all of the involved goals at the local, regional, state and federal level.

In addition to reducing contamination in the harbor to the Federally-mandated level, the CAG also worked with state and local government officials and corporate entities to deal with the open dumping of litter, garbage and tires, and barrels of abandoned production items on uncontrolled lakefront sites. It has worked to identify older commercial properties in the extended AOC area that are candidates for redevelopment and to encourage remediation of them. The CAG also received a number of small grants to create a full and complete database of all the floristic and avian species usage within the Glen Flora Ravine and the entire coastal wetland and dunal areas of Waukegan's shoreline with work beginning in 2001. This work was strongly supported by the Chicago Botanic Garden's Plants of Concern program, plus the USF&W's and IDNR's Natural Heritage biologists Endangered Species protection programs. The

CAG received a Great Lakes Restoration Initiative (GRLI) Grant to restore portions of the Waukegan Park NOAA Illinois Coastal Zone 2020 Survey Page 2 Waukegan Harbor Citizens' Advisory Group Submittal

District's Glen Flora Ravine and tableland and the coastal habitat starting south of Illinois Beach State Park and continuing south to the City of Waukegan public beach. In addition, the CAG received a grant to develop the Waukegan River Watershed Plan. The CAG also arranged for the purchase of a portion of the Glen Flora Ravine adjacent to Bowen Park that was held in private ownership and had it donated transferred to the Waukegan Park District.

The April 2020 issue of the *Journal of Great Lakes Research* provided a summary of "key lessons learned" for successful progress towards delisting AOCs in the article: "Thirty-five years of restoring Great Lakes Areas of Concern: Gradual progress, hopeful future" authored by John H. Hartig, Gail Krantzberg and Peter Alsip. The article provided a summary of their research as well as the key lessons learned which "include: ensure meaningful public participation; engage local leaders; establish a compelling vision; establish measurable targets; practice adaptive management; build partnerships; pursue collaborative financing; build a record of success; quantify benefits; and focus on life after delisting." During the three decades from its inception, the Waukegan Harbor CAG, an all-volunteer organization, with no paid staff, strived to be a model AOC and believe those lessons could have been drawn from its work.

During the first two decades after its inception, the CAG successfully worked weekly with liaisons from the Illinois EPA, IDNR, USEPA and the USACE. When the USEPA and the State of Illinois decided it was time to reenter the coastal program, the CAG supported the decision. When the Illinois Coastal Program was established the State of Illinois transferred State oversight of the Illinois AOC remediation program from the IEPA to the IDNR Coastal Program and the CAG was assigned a liaison from that office. Initially this transfer seemed to work well. However, the relationship between the CAG and the Coastal became strained.

It appears that the upper management of the Coastal Program felt that the CAG wasn't a "team player" primarily because the CAG expressed concerns that there was a premature and unwise attempt to expedite the delisting of the remaining AOC Beneficial Use Impairments (BUIs) so that the AOC could be rapidly designated as an Area in Recovery. As noted since inception, the Waukegan Harbor Area of Concern had been identified as having 6 listed BUIs. At the time of program oversight change, only 1 BUI had been delisted, and the other 5 BUIs were not, nor had they been fully publically vetted. While the CAG understands that there can be a difference of opinion about the methods used to achieve the Area of Recovery goal, the CAG believed and still believes, that the CAG's concerns on the outstanding 5 BUIs were based on science and the public's right to know their actual status. The CAG was chartered to represent all partners including the general public and not rubber stamp every proposal offered from government agencies but instead vet the proposals. Representatives of the CAG, the USEPA and IEPA have long recognized and respected that objective. When disagreements about a path forward arose, the CAG and the other agencies would work very hard to eventually come to a consensus to move forward. This has not been the case with many of the projects the coastal program

manages. There appears to be an ongoing policy by the Coastal Program management to make decisions with minimal CAG input and has ignored the massive amount of environmental work that has been done in the previous 20 year period and with the GLRI grant.

Not surprisingly this has had unfortunate consequences. The CAG has not been included, even in an advisory role, for vetting of projects that the Coastal Program has either proposed or eventually funded along the Waukegan lakefront. For example, though the CAG was responsible for the development of the Waukegan River Watershed Plan, it wasn't consulted when the City of Waukegan proposed and the Coastal program funded the armoring of a small stretch of the Waukegan River riverbank near the river mouth. This project is not part of a larger plan to improve the riverbank or the watershed and sits orphaned in an empty tract of land. There appears to have been no thought of expansion or maintenance of the project. The US Army Corps of Engineers (USACE) was not consulted nor, did it approve the quickly put together project. The CAG would not have supported this project without working closely with the USACE and the local citizens. Coastal Zone's motivation behind it appeared to be based more for a desire to get something done (use their funds) rather than carefully addressing a need while working with the appropriate federal agencies which would follow all local, state and federal laws.

In addition, the Coastal Program supported a City of Waukegan proposal to excavate a large section of coastal dunes and wetlands. This proposal was made while those dunes and wetlands were being restored through the CAG administered GLRI grant. The CAG was not informed of the project, and would not have supported the proposal without extensive USACE, USF&W and IEPA input. There are many needs in a clean-up project of this size without wasting money doing projects at cross purposes. Ultimately, much of the money spent is Federal, and private citizens do not like their money wasted. Based on the Coastal Program's project record in Lake County, a project's sustainability, and the sponsoring jurisdiction ability to maintain it, are not a priority. Surprisingly, the Coastal Program did not truly seem to recognize the extremely dynamic nature of the Lake Michigan lakefront. The Coastal Program has been encouraging the Foss Park District to apply for Coastal Program funding to establish a swimming beach at its Foss Park lakefront. Unlike the Waukegan swimming beach located only 3 miles to the north, this portion of the lakefront does not have a natural beach that is appropriate for swimming, is not easily and safely accessible - it's at the base of a 65' bluff and is not protected from storms. Establishment of a stable accessible swimming beach would require significant engineering and ongoing maintenance. The Foss Park District encompasses a community that has experienced significant disinvestment. The CAG definitely supports the Coastal Program's efforts to fund improvements at Foss Park, but the CAG's concern, and the concern of other professionally quite knowledgeable individuals who walked the site is about the upfront cost and sustainability of the project which seem to have been dismissed.

Some concerns noted over the past eight years – between Coastal Zone program and Waukegan Harbor Citizens' Advisory Group:

- Waukegan Harbor Canoe/Kayak ADA launch ramp – IDNR locator input/takeout map shows incorrect/unsafe location on all Illinois Lake Michigan Water Trail signage. It has

not been corrected the for three(?) years since it was first shown to the CAG, and has resulted in several mishaps in which kayaks/canoists followed the map and found themselves on the Akzo Nobel lakefront just north of the mouth of the Waukegan River. Based on the current height of Lake Michigan, there no longer is a beach at the site that is fenced off and is adjacent to the South Harbor breakwater which is built out of rocks leaving the kayaks/canoists stranded.

- GLRI grant - Waukegan Dunal Area – Summary of completed work and guidance for maintenance at finish of the grant – appears IDNR is using their 2013-2014 overview summary of the Waukegan Dunal Area, not the full complete multi-year dunal restoration, avian and floristic monitoring data provided in the Waukegan Harbor GLRI grant summary.
- Coastal Zone suggested more than once we should consider merging our financial Administrative Account with our GLRI grant account. This is both illegal, advised against by our well respected auditor, Warady & Davis and by USEPA advisors, and further would make it very difficult to track specific projects.
- Off shore buoys – should be gathering additional fish and avian migratory information as the CAG and its partners were planning. Does not appear Coastal Zone is working to include additional data gathering capabilities on the in-place buoys located off the Glencoe and Waukegan lakefronts.
- Coastal Zone indicated to two Waukegan Harbor CAG members that the Waukegan Harbor CAG should shut down, and IDNR Coastal Zone take over the remaining work – at an annual AOC meeting in Detroit.
- A couple of years later Coastal Zone repeated the same suggestion in a direct presentation to the Waukegan Harbor Citizens' Advisory Group Ex. Committee, which at the request of Coastal Zone, was held just prior to a regular monthly Waukegan Harbor CAG meeting.
- Coastal Zone representative attending Waukegan Harbor Citizens' Advisory Group often could or did not answer questions asked by those in attendance related to the Coastal Zone presentation at the meeting or other co-related Coastal Zone ongoing projects stating that it was not part of their own work. Follow-up information on questions was variable. Coastal Zone staff presenters were gracious, friendly and attentive when present at CAG meetings.
- Coastal Zone does not reach the real citizen base of Waukegan and nearby communities, and is not truly knowledgeable about individual Waukegan lakefront land parcels and their historical use back to pre-settlement related to current hydrology nor present accurate, simple and clear information at Sand Management meeting.
- Coastal Zone authorized City of Waukegan to dig up nearshore dunes on City owned property while GLRI grant was actively working on dunal restoration of the sites. No USACE authorization to do so. Definitely knew of the ongoing GLRI work. Resulted in action being taken against the City of Waukegan by the USACE. This was not the first time the City was cited by the USACE for unpermitted sand removal activities on the nearshore.

- Coastal Zone advocated to the City of Waukegan to just move the dunal sands and ask for forgiveness later - done at formal meetings with the Coastal Zone, City, Park District and Waukegan Harbor Citizens Advisory Group present.
- Coastal Zone offered several times to hold a focus group meeting to discuss how Waukegan Harbor CAG should be run and its effectiveness. The CAG had already done it several times over a period of years in a broader manner with numerous citizens and partners, and were consistently told by the citizens and partners not to bow to City and Coastal Zone oversight.
- Coastal Zone grant process was closed down for about two years reasonably soon after they had begun operation – which forced the CAG to put our own dollars into the Administrative grant instead of using funds allocated by USEPA for use by Area of Concerns around the Great Lakes. The CAG covered all of its Administrative contracts with personal funds which were then reimbursed several years later when the Coastal Zone funds were released for use. The USEPA funds for specific Great Lakes AOCs were held in a US government account in Cincinnati and were pass-through funds to be paid directly to RAP groups. Not sure if this was part of the Coastal Zone shut down, or of the State of Illinois Gov. Blagojevich fund sweeps, or possibly both.
- Coastal Zone, during their own grant offerings, was helping to write grants for their own grant recipients – North Chicago and Waukegan. Usually it is made very clear in grant instructions the final date on which applicants may ask for help and input from the grantor, and after that date no further help will be given to applicants. USEPA is very good at letting all applicants know the cut-off date related to “no further help prior to submission”.
- Overuse of Personal Pronoun: “I have money for you”, rather than “USEPA and Coastal Zone has money we are holding for you”. Use of “I” noted in many public meetings, both large and small, instead of using “Coastal Zone has grant funds available”.
- Coastal Zone told the CAG emphatically in a long letter to stop writing quarterly reports related to the Administrative Grant which was incorrect because the State of Illinois funding year is July 1 – June 30th. The State of Illinois fiscal year does not stop at the end of September and start at beginning of October as in the case of the Federal Budget year. Please note: The Waukegan Harbor CAG was delayed in getting quarterly reports in because of the demands of the GLRI grant, regular monthly CAG meeting reports, and lack of positive cooperative work expectations between Coastal Zone and the Waukegan Harbor CAG. They were all turned in, some just late.
- Coastal Zone sent material to be reviewed on short deadlines while the CAG was deep into its own GLRI contracts, work and reporting, while holding day jobs simultaneously. The Waukegan Harbor CAG is a 501(c)4 organization, and does not work directly for IDNR Illinois Coastal Zone.
- Noted the IDNR Coastal Zone Director or representative was not at some of the AOC annual AOC meetings while they were in a Government Review status, nor were they in attendance at regional and state level meetings where one might expect to see Illinois well represented.

- \$200,000 was spent armoring the near shore area close to the mouth of Waukegan River without any apparent notice to the USACE. USACE called CAG to ask if CAG had done the work which the CAG definitely had not, and most definitely the CAG would be continuing to work directly with the USACE and the City of Waukegan and local property owners. It is presently beginning to fall into disrepair.

Well done actions taken by Coastal Zone for the Waukegan Harbor Area of Concern and Extended Area of Concern:

- Benthos Degradation BUI – data and study were well researched and presented by Coastal Zone representative. At CAG’s request the Coastal Zone representative arranged to have the contractor give presentations before and after their harbor sediment studies were done. Excellent feedback from the general public regarding the thorough presentations and updates.
- Degradation of Phytoplankton and Zooplankton BUI – Comments here are the same as shown in bullet point above. Coastal Zone staff representative answered questions well, and followed through in timely manner on questions for which they did not have the data immediately available.
- It is very helpful to have an IDNR Coastal Zone representative at each CAG meeting. This gives the Coastal Zone a much better insight into the issues on the monthly agenda which the CAG is covering or working on, and to better understand the challenges, issues and the progress being made in those areas. It also gives everyone present time to ask the Coastal Zone questions related to these other area projects within the AOC and Extended AOC, and works toward building sound healthy relationships with many partners. Sporadic attendance, which has been the tendency, reduces the opportunities, and lessens the full understanding of the issues and needs of the full Area of Concern and Extended Area of Concern. Budgeting for this should be a Coastal Zone priority.

The Waukegan Harbor Citizens’ Advisory Group looks forward with great enthusiasm to the day when we can formally enter into the designation of “Area Under Recovery”, and then to final delisting. The date is much closer now than ever before which is to the credit of three decades of extraordinarily hard work from our national, regional, state, and local affiliate agencies, plus that of our many corporate, institutional, and individual citizen partners, and of the International Joint Commission. Thank you to NOAA for the upper level work you have provided in funding the necessary agencies which make our success possible, and for providing the Coastal Zone programs for every state which qualifies.

The Waukegan Harbor Citizens’ Advisory Group, on behalf of the USEPA, has maintained a full and complete 30 plus year record of all the work done with the Waukegan Harbor Area of Concern and Extended Area of Concern, which is located in the USEPA Document Repository now held by the Waukegan Historical Society under the lead of the Waukegan Park District.

We are most grateful that you asked for our review and input into work of the IDNR Coastal Zone as the lead state agency for the Waukegan Harbor CAG’s work in the Waukegan Harbor Area of Concern and Extended Area of Concern for the past eight and a half years. We hope our

comments are helpful and productive, and we look forward to furthering cooperation with our partner lead agencies.

Response: The evaluation team greatly appreciates the time and effort that the Waukegan Harbor Citizens' Advisory Group took in submitting such detailed comments. We have considered your comments as we assessed the efforts of the Illinois Coastal Management Program in the Waukegan area as part of our evaluation of Target Area 1: The Blue Economy. Overall, we find that the program has facilitated significant progress in removing beneficial use impairments in the Waukegan Harbor Area of Concern, and recognize that the program has been involved in several other projects in the Waukegan area. Please see our detailed discussion of improvements that can be made in terms of communication and grants administration under Target Area 3: Program Administration. We have shared your comments on specific projects outside the scope of our review with the Illinois Coastal Management Program for their consideration.

Clayton Harris III, former Executive Director, Illinois International Port District

I offer comments and views on the Illinois Coastal Management Program as the (former) Executive Director of the Illinois International Port District (IIPD). I am not sure exactly what you are looking for in terms of feedback on the program, but let me start out by relating to you what the program, Diane and her team and the opportunity did for the IIPD. I began as the Executive Director in March of 2016 and there had not been a significant amount of attention paid to the IIPD in years. When I came in, Diane and her team reached out to me and asked what IDNR could do to help the IIPD. They recognized the integral value of the IIPD and the natural connection that the port had with the greater good. I would even argue that their recognition allowed me to recognize the same, in the beginning, and that made all the difference in how I approached my position with the IIPD.

Early on, I had multiple conversations with Diane about what we could be doing and what we should be doing. And, in all honesty, it was overwhelming. I even told her that and she didn't even blink. She told me that one of the aspects of the program was capacity building and that IDNR worked with multiple partners to achieve their goals. She immediately connected me with what would become known as the Calumet Collaborative and with the Chicago Community Trust. This led to Delta Institute working as an intimate partner with the IIPD. This partnership is DIRECTLY responsible for the IIPD ultimately becoming the beneficiary of \$17M+ in grant funding.

The addition of ONE more individual who understood the mission of IDNR and could continue to reiterate the importance of that mission fully helped out the IIPD allowing me to focus on multiple areas of the IIPD and to ultimately understand each aspect of those areas and link them together. In fact, outside of the financial opportunities provided to the IIPD i would say the feather in my cap walking out of the IIPD door is what was born out of this understanding and partnership with IDNR: the E.R.I.C. Initiative.

The E.R.I.C. (Environmental and Economy, Recreation and Resources, Innovation and Industry, Conservation and Community) initiative is now how the IIPD evaluates all things port related. Hopefully, the new Executive Director will share this vision with you. Through this lens the IIPD has embarked on a Master Planning exercise with CMAP and has begun polishing the gem of the Great Lakes to regain its stature as the preeminent port that focuses on all things impacted by the port or E.R.I.C.

This is just the tip of what this program has meant to the IIPD and truly what allowed me to enjoy a successful tenure as the Executive Director.

Response: The evaluation team appreciates Mr. Harris' comments on behalf of the Illinois International Port District and has addressed the partnership between the district and the Illinois Coastal Management Program under Target Area 1: The Blue Economy.

Emily Rhodes, Illinois International Port District

I can tell you that the Coastal program's support has had incredible value to port operations. Coastal support has allowed the Port to not only increase capacity so that we can go after more funding to make much-needed improvements at our facilities and allow us to engage in the master planning process, but the program's belief in and understanding of the importance of the work that is being done at the IIPD has been key in advancing important projects here. Their support has led to our knowledge and involvement with other key groups doing great work in the Calumet region. One example is our ongoing project with Active Transportation Alliance who is conducting a bike/pedestrian trail feasibility study at Lake Calumet. We very much appreciate and are in a better position because of the Coastal Management Program.

Response: The evaluation team appreciates Ms. Rhodes' comments and the insights into coastal management program involvement with the Illinois International Port District and the surrounding communities in the Calumet area. We have addressed this involvement in Target Area 1: The Blue Economy.

Paul A. Kakuris, President; Illinois Dunesland Preservation Society

This synopsis of an evaluation is observed from a 35-year coastal expert observation. The CZM in Illinois he has been deficient and recklessly managed for some time. I am the president of the Illinois Dunesland Preservation Society. Our society cofounded the first state dedicated major nature preserve in the United States, Illinois Beach State Park in Zion, IL. The society has been in existence for over 70 years attempting to preserve this area.

As a coastal professional, my business has taken me throughout the world dealing with coastal processes, policy, design and the coastal political arena. I have attended scientific, coastal

conferences over the years. Many of my colleagues have indicated that Illinois is in the dark ages with regard to coastal zone management; I partially agree.

Some of the deficiencies that I see are:

1. Autocratic management style
2. Careless expenditures of major dollars without adequate checks and balances leading to garbled scientific data.
3. The coastal permitting program allows property owners to construct inadequate and poor shoreline protection leading to continual damage to adjacent properties
4. The highly charged political climate of the IDNR which administration program manifests in little to no enforcement of violation of coastal permits which the department administrates
5. The majority of the Illinois shoreline is privately owned, however the coastal zone program has endeavored to exclude the majority of the private riparian's from meaningful participation in the decision making process.
6. Created a climate of polarization between the private shoreline ownership and the minority government ownership of the shoreline. The ICZM therefore is biased toward the minority government shoreline owners creating these results.
7. The ICZM has willfully excluded other experts and stakeholders for inclusion in the management processes for the coastal community in the state of Illinois.
8. There is a lack of knowledge, careless spending and checks and balances pertaining to coastal zone expenditures leading too little or no results for expenditures.
9. ICZM has expended major dollars with projects in affluent coastal North Shore municipalities yet leaving a void and expenditures in coastal communities that are not affluent and have a high percentage of minorities.

These are just a few of not only my concerns but many of my colleagues in the peripheral of this mismanaged agency. The Illinois coastal zone program should have a complete review with the implementation of an inspector general. These comments can be supported by me and others. I would be happy to share them in detail with you or the proper investigatory components of your agency.

Response: The evaluation team appreciates Mr. Kakuris' comments and has considered them in the preparation of this evaluation. Regarding your comment on beach management, please see our evaluation of Target Area 2: Coastal Resilience, which reflects the input we received from numerous scientists, engineers, and agency representatives regarding beach management in both Lake and Cook Counties. Please also see our evaluation of Target Area 3: Program Administration, where we address several of the concerns you raised, including creating better communication channels. We would also direct your attention to Metric 1: Coastal Access on page 18 of these findings that tracks the program's progress to provide improved access to areas that serve under-resourced or disenfranchised communities and people with mobility challenges.