



## Healing Our Waters-Great Lakes Coalition

June 27, 2012

The Honorable Lisa Jackson  
Administrator  
U.S. Environmental Protection Agency  
Washington, DC 20460

Dear Administrator Jackson:

We were pleased to see the Federal Register notice on Thursday, May 31, 2012, announcing EPA's intent to establish a Great Lakes Advisory Board. Our Coalition has pushed for simplifying the number of committees overseeing Great Lakes protection and restoration for a number of years and have felt that there is a need for a mechanism that allows stakeholders to provide ongoing advice in a formal setting rather than the ad hoc, although important, way that currently exists. We appreciate your attention to this issue and support the creation of this board.

In order to maximize the effectiveness and efficiency of the board, our governance board would like to make the following recommendations that help sharpen the new advisory board's focus towards some more specific tasks. These areas would be in addition to the objectives of the board, such as providing general advice and recommendations on Great Lakes protection and restoration policy and long term goals and objectives for Great Lakes protection and restoration, as identified in the summary of the Federal Register notice:

- The Great Lakes Advisory Board must provide annual recommendations on priority areas— both geographic locations and type of work—for which the Great Lakes Restoration Initiative should focus its resources. These recommendations must come early enough in the budget process so agencies can integrate them into their budget submissions to the Office of Management and Budget in early September each year. Federal agencies must not be allowed to treat these recommendations as discretionary and should be required to report on why a recommendation was ignored.
- The board must provide recommendations on updates to the Great Lakes Restoration Initiative Action Plan as the Action Plan is updated, for example changes in recommended actions, targets, and measures of success.
- The board must provide recommendations on measures that improve the accountability of the use of Great Lakes Restoration Initiative funds. This includes reviewing how GLRI funds are being spent and whether they are being spent on the right projects in the right areas. This is especially important given the ongoing need to adaptively manage the Initiative to ensure the projects being funded are effective in restoring the environment and are efficient uses of taxpayer funds.
- The board must provide recommendations on the criteria EPA uses in selecting projects

to which it grants GLRI funds.

- The board must establish an independent science advisory committee for gathering independent science advice from the non-federal research stakeholder community and to oversee the development and integration of a science plan. The EPA's Science Advisory Board's recent report recommended that EPA develop a science advice and implementation structure to both provide advice on the plan and implement key elements of a science plan. We recommended to you on March 22, 2012, that, while the science plan itself could be developed by an agency-led process, independent science advice is best achieved in conjunction with other stakeholder advice and should be integrated into that process if one is developed. A science committee to the advisory board (with extensive involvement from academic and other non-federal researchers) could fulfill our recommendation to you.

In addition, in order to fulfill these recommendations, we assume that the appropriate technical staff from EPA and the other agencies will be available to brief the board and its committees on GLRI activities on a regular basis.

Thank you for considering our recommendations. Please do not hesitate to contact Chad Lord, our coalition's Policy Director, at (202) 454-3385 or [clord@npca.org](mailto:clord@npca.org) if there are any questions.

Sincerely,



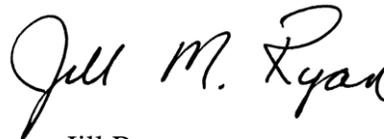
Andy Buchsbaum  
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Cc: Susan Hedman, Regional Administrator, Region V, USEPA  
Cameron Davis, Senior Advisor to the Administrator, USEPA