



November 15, 2012

Lisa Jackson
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Jackson:

On behalf of our over 120 member organizations across the Great Lakes region, the Healing Our Waters-Great Lakes Coalition is writing to provide feedback and make recommendations to ensure the sound, efficient and successful implementation of the Great Lakes Restoration Initiative (GLRI) now and into the future. These substantive comments have been compiled through extensive feedback from HOW Coalition members who have received GLRI grants. We would like to arrange a meeting with you to further discuss these comments.

In order to continue to make progress and see results from the crucial restoration work being done through the GLRI, EPA must provide at least \$300 million for the Great Lakes Restoration Initiative in its fiscal year 2014 budget. We cannot afford not to protect the Great Lakes, the source of drinking water for 30 million people. In community after community, Great Lakes restoration activities are creating jobs, protecting public health, and upholding a way of life. However, there is much more work to do. If the nation cuts funding now, it will only cost more later because projects will only get harder and more expensive the longer we wait.

The GLRI has breathed new life into cleaning up the Great Lakes, and is providing one of the highest returns on investment in the federal budget. It is a widely held belief in the Great Lakes community and among HOW members that we could not have achieved the scale of restoration work being done in the region without the vision and focus of the GLRI. The federal agencies involved in administering the program deserve high praise for their unending work to create and refine the GLRI. In only three years, it has become the most successful restoration vehicle in Great Lakes history.

In particular, the Coalition was pleased to see the EPA take our recommendation of focusing GLRI funds and resources into high priority geographic areas. This approach not only allows the Great Lakes community to showcase significant measurable restoration gains each year, it also creates a more holistic watershed approach within the GLRI that encourages collaboration and partnerships. By setting geographic restoration priority areas and facilitating collaboration among groups within the same geographic focus area, EPA and other federal agencies are effectively supporting a suite of restoration activities whose benefit is greater than the sum of its parts. The added benefit to this approach is the ability to swiftly highlight results coming out of focus areas around the lakes, such as the de-listing of five Areas of Concern by 2014.

In addition, grantees continue to be very impressed with the ability of the National Oceanic and Atmospheric Administration, U.S. Fish and Wildlife Service, and National Fish and Wildlife Foundation to smoothly manage habitat and wetland restoration projects under the GLRI. From the application, review and acceptance process, to the implementation of the grant, these agencies have set up effective and streamlined processes that foster positive relationship building between grantee organizations and agency staff. One component in particular that has received high praise is agency staff's willingness to propose improvements to potential projects, allowing the applicant to strengthen their project prior to a final grant decision being made. This is an important step in the application process, because it ensures that federal dollars are being invested in projects that have the highest chance for success. We applaud NOAA, FWS, and NFWF for their work in this area.

Another aspect of habitat restoration grants that grantees find constructive is the ability of the agencies to have the flexibility to focus on high priority projects that foster robust partnerships and to invest at different levels in those projects. This flexibility not only facilitates new partnership building efforts locally and regionally, but fosters a sense of ownership into projects as partners work together to meet their goals. It also allows for the development of more effective and comprehensive projects. These robust partnerships are allowing larger organizations with the administrative abilities to manage the funds and to pass through funding to smaller groups who have the expertise to do the on-the-ground work. The effect is that smaller groups are able to avoid the administrative burdens that come with federal funding and concentrate on what they do best.

As new partnerships are built and existing partnerships are strengthened under the habitat focus area of the GLRI, Great Lakes groups believe this work has created a strong foundation for success both through creating the capacity to get work done efficiently and successfully by a larger suite of partners in the region, as well as positioning groups to successfully go after additional dollars within the GLRI program. In addition, GLRI grants are inspiring additional projects outside of the program which are in line with the objectives of the GLRI but will be able to take advantage of additional non-GLRI federal dollars. The ability to leverage funds outside of the GLRI to do the work needed to restore the Lakes is a testament to the GLRI's success and will help the Great Lakes community to reach its goal of making our Great Lakes healthy once again.

In order to continue the successful work we have seen under the GLRI, we urge the federal agencies responsible for administering the GLRI and its many diverse granting programs to continue to objectively evaluate the program and to update current program practices to address the following comments.

First and foremost, there continues to be concern over the amount of grantee staff time and field time that is being lost due to excessive Quality Assurance Project Plans for grantees of EPA projects under the GLRI. In some cases, in the fall of 2012, Coalition members were still awaiting approval of Quality Assurance Project Plans for GLRI grants awarded in 2010. This two year delay in approval is unnecessary – the agency should be expending the staff time and resources needed to effectively and efficiently work with grantees through the QAPP process to satisfy both party's needs. Due to the continued project delays being caused by QAPPs, we

recommend, as we did in our 2011 comments to the agency, that EPA re-evaluate and streamline its QAPP development and approval process, with a focus on making the process less overwhelming, cumbersome, and time consuming for grantees while maintaining the objective of the plans, to ensure a quality project moving forward. One way to avoid QAPP delays with returning grantees – those who have successfully completed at least one GLRI project under a GLRI granting agency – is to provide acknowledgement of this success within the QAPP approval process for all new projects led by the grantee. The grantee's previous QAPP approval and project success would serve as one portion of future QAPP approvals, allowing grantees with good QAPP track records a streamlined approval process for additional projects. In addition, we request an overview from EPA on the steps that have been taken in the past year to address the concerns raised around QAPPs by the Coalition in our 2011 comments on the GLRI to the agencies.

In 2011, the Coalition noted that response time from project managers, particularly at EPA, was concerning to grantees as too much of their time was being spent reaching out to agency staff and then waiting for project managers to communicate with them about their project. While we have seen response times improving over the past year, we are still aware of a few cases where this issue has not been adequately addressed. We urge EPA to put in place more effective management of EPA staff time to engage in the timely and productive communications necessary for grantees to move forward with their projects.

In addition, EPA must be vigilant that federal agencies do not use GLRI funding as part of their base budgets, as Congress instructed the GLRI to be supplementary, not to replace base funding. EPA must also work to limit the amount of GLRI funding held by agencies for agency activities and instead encourage federal agencies to partner with non-federal sponsors in undertaking restoration activities.

The Coalition continues to support the use of a portion of research and monitoring funds for the operation, maintenance and monitoring of completed GLRI projects. Completed on-the-ground and in-the-water projects often require ongoing operation and maintenance work, and monitoring, which is an important component of that work, is critical to track the beneficial impacts of projects. Operating, maintaining and monitoring the benefits of projects is equally important to successfully attracting other sources of investment to projects – being able to illustrate restoration project benefits in the short and long term makes it more palatable for states, municipalities and private interests to invest additional funds in restoration work into the future. Therefore, it is important that applicable GLRI awards have some way to operate, maintain and monitor a project. Because local organizations do not have the resources to continue this work on their own without additional support, this could include a small amount of funding within the grant set aside for operation and maintenance or the option for GLRI grantees to apply for a small operation, maintenance or monitoring grant once a GLRI project is successfully implemented.

Just as importantly, the federal agencies must take a more proactive approach to requiring grantees to actively plan for climate change impacts as a piece of their restoration project. It is well documented that climate change is impacting the Great Lakes – it is only prudent that we protect the federal investment in restoration by ensuring that impacts to the ecosystem from

climate change are being adequately addressed as a piece of all grants under the GLRI. Therefore, the Coalition urges EPA to adopt the climate-smart language being used by NOAA in their GLRI Request for Proposals that requires grantees to incorporate climate smart practices into their GLRI project. Assigning points to climate practices in the application process provides a built in mechanism to adequately address climate impacts to the Lakes from the ground up and to plan for the future.

Issues like operation and maintenance funding and addressing climate adaptation within restoration project plans can more easily be addressed if Great Lakes stakeholders are given the opportunity to provide feedback on the EPA's Request for Proposals under the GLRI prior to the RFP being finalized for release. Although we understand and support that EPA must be able to judge applications in an unbiased manner, we feel strongly that the agency should seek out the expertise available in the region to develop a point system within the application process that takes into account the often times complex and comprehensive approaches needed to adequately address restoration work. For example, being able to adequately evaluate a project that is proposing a comprehensive watershed approach to a Great Lakes threat is critically important to the success of the GLRI. In addition, providing a handful of scoring examples for fully funded past GLRI projects to prospective and rejected grantees would be another way ensure high quality applications into the federal agencies during the GLRI Request for Proposal processes.

Another obstacle that continues to plague GLRI grantees in successfully implementing a restoration project is the ability to secure the proper state level permits for a project. Slow and tedious permit processing at the state level, particularly in the state of Michigan, are causing extensive project delays and rising project costs for grantees. Although this is not an issue the federal agencies are able to control, it is important to know that the problem is limiting the ability of grantees to expend their federal grant funds in a timely manner. The Coalition has submitted the attached supplemental (found in Appendix I) to the Michigan Office of the Great Lakes within the Michigan Department of Environmental Quality. The Michigan Department of Environmental Quality is in charge of providing state level permits for restoration projects, and the supplemental is being provided to help explain the issues being faced by GLRI grantees in Michigan and to recommend steps the agency can take to expedite permits for good projects while ensuring that the permitting process maintains its integrity. We encourage the EPA and other federal agencies to stress the importance of less tedious permitting processes to all state agencies for sound restoration projects. Just as importantly, where funding is allocated to state agencies for restoration work, these agencies should make a more concerted effort to work collaboratively with non-governmental organizations to build more comprehensive projects.

EPA must do a better job of communicating the successes of the GLRI program to the general public, including promoting work that is being completed in our communities and illustrating how the federal investment in the GLRI is benefiting people, communities, and wildlife in the region through improved Great Lakes health. Although EPA has provided grants to organizations in the region to undertake some of this important outreach work, it is just as important for the agency to proactively promote the program through its events and through additional outreach tools. Of particular interest to the Coalition is a much more comprehensive tracking and reporting system to include beneficial economic impacts like job creation, beach days gained from reduced public health problems, etc. In addition, providing more lead time on grant

announcements, project unveilings, and AOC de-listings to Great Lakes stakeholders, such as the HOW Coalition, is an easy and fruitful step EPA can take to effectively communicate the importance and successes of the GLRI. Finally, the Great Lakes Accountability System (GLAS) can be made more functional as a communication and education tool for stakeholders by providing information on project progress, giving background about the Great Lakes and the issues or threats facing the Great Lakes region, and providing a more detailed explanation of why GLRI projects are important investments to maintain the overall health and vitality of the Lakes.

As we near the start of 2013, the Coalition encourages EPA to update the vision and objectives of the current GLRI Action Plan, which will become outdated in 2014. To update the Action Plan effectively, the agency should engage in significant consultation with key Great Lakes stakeholders including the eight Great Lakes states, cities, the HOW Coalition, and other non-governmental groups prior to revision. The updated Action Plan should include lessons learned from the first four years of the GLRI, objectives to date that have been reached through 2014, new goals to strive for, and measurable outcomes for the next four years of the GLRI. The soon to be formed Great Lakes Advisory Board would be a good fit to undertake this important work alongside the federal agencies and key stakeholders.

Thank you for the opportunity to provide these comments to the federal agencies and for your continued work to move the restoration of the Great Lakes forward. The HOW Coalition remains dedicated to working with our partners at the federal, state, and local level to effectively implement the comprehensive restoration plan for the Great Lakes. We look forward to meeting with representatives from your agency to discuss our input.

If you have any questions in the meantime, please contact Chad Lord, Policy Director of the Healing Our Waters-Great Lakes Coalition, at (202) 454-3385 or clord@npca.org.

Sincerely,



Joel Brammeier
Co-Chair
Healing Our Waters-Great Lakes Coalition



John Jackson
Co-Chair
Healing Our Waters-Great Lakes Coalition



Lynn McClure
Co-Chair
Healing Our Waters-Great Lakes Coalition

Cc:

Cameron Davis, Senior Advisor to the Administration, U.S. Environmental Protection Agency
Susan Hedman, Regional Administrator, Region V, U.S. Environmental Protection Agency

APPENDIX I

State Supplemental: Memo to State of Michigan Permitting Agencies

John Allan
Director, Office of the Great Lakes
Michigan Department of Environmental Quality
525 West Allegan Street
Lansing, MI 48909

Dear Director Allan,

On behalf of the Healing Our Waters-Great Lakes Coalition and our over 120 members in the Great Lakes region, we are writing to provide comments and recommendations that we believe will help to more effectively implement federal Great Lakes Restoration Initiative projects in your state.

Each year the Coalition solicits feedback from Coalition members who have received GLRI grants. In this way, we seek to provide the federal and state agencies working to implement the GLRI with constructive feedback on how to improve the program as we work toward our common goal of restoring the Great Lakes.

Coalition members are particularly concerned with the numerous project delays and increased project costs that are being experienced in Michigan due to sometimes lengthy and bureaucratic state permitting processes. In some cases, projects that received federal funding in the first year of the GLRI (2010) are still stuck in the state permitting process. Although we understand and support Michigan's obligation to undertake thorough permitting reviews when changes to our water resources are being proposed, it is important to commit to timely permitting reviews that address all potential issues instead of taking a piece-meal approach which can cause the process to drag out and high priority restoration projects to be extensively delayed. To most effectively move awarded GLRI projects forward, Coalition members would like to see state agencies address all permits associated with a given project concurrently and in a timely manner.

In addition, we urge the Michigan Department of Environmental Quality to ensure that field offices across Michigan are taking a uniform approach to how permits are reviewed and processed, and that sufficient staff time is allocated to provide timely and effective permit reviews for restoration projects.

We thank the Michigan Department of Environmental Quality for its hard work in helping to effectively implement the Great Lakes Restoration Initiative in Michigan and look forward to seeing a more effective, efficient, and uniform permitting review process put in place to ensure that restoration projects are moving forward.