

August 19, 2009

USEPA Great Lakes National Program Office (G-17J)
Attention: Anthony Kizlauskas
77 West Jackson Blvd.
Chicago, IL 60604

Re: Great Lakes Multi-Year Restoration Action Plan

To Whom It May Concern:

As members of the Healing Our Waters[®]-Great Lakes Coalition, we respectfully submit these comments in response to the Environmental Protection Agency's request for comments on the "Great Lakes Multi-Year Restoration Action Plan" (Action Plan).¹

Introduction

The Great Lakes are an international treasure. Spanning 750 miles from west to east, the lakes define the physical, cultural, and historical landscape of North America. The Great Lakes hold 20 percent of the world's fresh surface water. The region is home to over 30 million people and contains rare plants and animals, including 40 species found nowhere else in the world. While the Great Lakes region has experienced significant economic challenges over the past decade, the Great Lakes economy played a significant role in forging this nation and continues to generate substantial economic productivity. Furthermore, it is poised to resurge economically with significant investment in restoration funding.

The challenges facing the Great Lakes are equally well-defined. Invasive species, nonpoint runoff, nutrient loading, toxic chemicals, natural land conversion, hydrologic alterations, and other stresses are pushing the lakes toward, or beyond a "tipping point" at which ecosystem-level changes occur rapidly and unexpectedly, confounding the traditional relationships between sources of stress and the expected ecosystem response.

There is compelling evidence that in many parts of the Great Lakes we are at or beyond this tipping point. Certain areas of the Great Lakes are increasingly experiencing ecosystem breakdown, where intensifying levels of stress from a combination of sources have overwhelmed the natural processes that normally stabilize and buffer the system from permanent change.² (Emphasis added)

We believe that our nation must take advantage of the unprecedented opportunity provided by the President's Great Lakes Restoration Initiative (GLRI) to protect and restore the Great Lakes. The longer we wait the more expensive and difficult it becomes. By restoring ecosystem resiliency and remediating the legacy of toxic pollution and other human-induced stresses, we

¹ EPA. 2009. Great Lakes Multi-Year Restoration Action Plan Available at <http://www.epa.gov/glnpo/glri/glmyrapo.pdf>

² Bails, et.al. 2005. Prescription for Great Lakes Ecosystem Protection and Restoration. p. 1, available at http://www.healthylakes.org/site_upload/upload/prescriptionforgreatlakes.pdf

can protect the Great Lakes environment while simultaneously contributing to the region's economic growth.³ Doing so will also help the Great Lakes region adapt to the most serious environmental challenge it faces – impacts caused by global warming.

Healing Our Waters[®]-Great Lakes Coalition Principles

On March 26, 2009, our Coalition's co-chairs wrote to each member of the Federal Great Lakes Interagency Task Force suggesting four principles that we believed would help the GLRI succeed. We are pleased that the Action Plan mostly incorporates our suggestions, which we have highlighted below. We also have highlighted areas where we hope the Action Plan can be revised to more closely match our recommendations.

Ensure that all funded activities help implement the Great Lakes Regional Collaboration Strategy to Restore and Protect the Great Lakes' highest priority goals and recommendations. The GLRC Strategy remains the centerpiece for Great Lakes restoration and protection.

The Action Plan states that it uses “the [Great Lakes Regional Collaboration] Strategy as its base and will implement portions of that Strategy.”⁴ We continue to support using the GLRC Strategy as the blueprint for Great Lakes restoration. However, the Strategy needs to be updated to reflect the most recent science and incorporate recommendations about actions needed to allow the Great Lakes to adapt to the effects of global warming. Although outside the scope of the proposed Action Plan, we encourage EPA to articulate a vision for updating the GLRC Strategy, which should include recommendations for actions needed to respond to climate change.

Supplement – not supplant – funding for existing Great Lakes programs. The initiative must accelerate Federal, State, local, tribal, and non-governmental efforts to restore the Great Lakes and ensure that substantial new funding goes to the most effective on-the-ground, job-creating restoration activities that result in environmental improvement.

The Action Plan explicitly states that Federal actions chosen pursuant to the action plan will “Support new work, or enhance (but do not replace) existing Great Lakes basin activities.”⁵ We continue to support the use of criteria such as this to ensure that the GLRI supplements and enhances Great Lakes programs and activities.

More broadly, we also support the Action Plan's focus on efforts that accelerate restoration work and attempt to direct funds toward effective, on-the-ground restoration activities. The Action Plan states that another criterion for project selection includes a “Bias for projects that are both ready-to-go and will have results soon.”⁶ The GLRI's fiscal year 2010 plan also has a number of actions designed to accelerate cleaning up legacy pollutants and supporting on-the-ground restoration. For example, the FY2010 plan specifically talks about “on-the-ground

³ See Austin, J.C., Anderson, S., Courant, P.N., Litan, R.E.. 2007 Healthy Waters, Strong Economy: The Benefits of Restoring the Great Lakes Ecosystem. The Brookings Institution, available at http://www.healthylakes.org/site_upload/upload/GrtLakesCostBenefit.pdf. The study found that investing in Great Lakes restoration (E.g., cleaning up Areas of Concern, restoring habitat and wetlands, reducing polluted runoff from farms and urban areas) would result in a two-to-one economic return.

⁴ EPA. 2009. Great Lakes Multi-Year Restoration Action Plan Action Plan: Draft: July 17, 2009; p.1. Available at <http://www.epa.gov/glnpo/glri/glmyrapo.pdf>

⁵ Ibid; p. 6. See also EPA's public presentation found at http://www.epa.gov/glnpo/glri/GLRI_Slides.pdf (slide 9).

⁶ Ibid; p. 4.

implementation of Aquatic Nuisance Species Management Plans”⁷ and accelerating “the rate of sediment clean up in Areas of Concern.”⁸ Given the explicit goals stated throughout the proposal and the significant increase in funding, we are hopeful that the plan will accelerate restoration activities through a combination of direct restoration work (e.g., wetland restoration; establishment of buffer strips; shoreline softening and other hydrological restoration), as well as restoration methodology development, planning/design, and monitoring projects that lead to on-the-ground restoration activities. (See discussion on monitoring below.)

Ensure all State, local, Tribal, and non-governmental entities are involved in the new initiative in an open and transparent way.

The public meetings this summer demonstrate a commitment to openness and transparency, which we appreciate and applaud. We expect this willingness to engage the public to continue as spelled out below.

Improve coordination and collaboration among Federal agencies and between the Federal government and State, local, Tribal, and Canadian Government, colleges and universities, and non-governmental entities using a cross-cut budget and other mechanisms that report progress or lack of progress in achieving the GLRC Strategy’s goals.

The Action Plan seeks to improve coordination by drawing on the ecological priorities, goals, and objectives of the Great Lakes Regional Collaboration Strategy and other relevant bi-national, national, and regional coordinated strategic planning efforts.⁹ However, in noting that the GLRI’s goals, objectives, and targets will be “aligned with those of the Great Lakes States and local and Tribal governments,”¹⁰ the Action Plan leaves out relevant efforts of non-governmental organizations (NGOs). This statement in the Action Plan seems out of place given EPA’s repeated goal to leverage all the resources within the region – including the resources of all non-Federal stakeholders – to undertake restoration work quickly in fiscal year 2010.¹¹ NGOs are responsible for and/or involved in much of the on-the-ground restoration work and have tremendous levels of expertise on issues affecting local areas, and their experience (including in some cases previous work in priority-setting) should be utilized to help set priorities. We urge EPA to ensure that the Action Plan recognize and the GLRI utilize all stakeholder input, including in establishment of goals, objectives and targets. At the same time, EPA and other federal agencies should acknowledge that many NGOs do not currently have sufficient resources to participate in some (let alone all) of the various planning efforts relevant to Great Lakes restoration identified in the Action Plan,¹² and some GLRI projects could potentially be designed to increase such involvement.

⁷ EPA. 2009. “Great Lakes Restoration Initiative Proposed 2010 Funding Plan.” p. 11. <http://www.epa.gov/glnpo/glri/GLRIProposed2010FundingPlan050509.pdf>

⁸ Ibid; p. 9.

⁹ EPA. 2009. Great Lakes Multi-Year Restoration Action Plan Action Plan: Draft: July 17, 2009; p. 4.

¹⁰ Ibid; p 5.

¹¹ EPA’s public presentation found at http://www.epa.gov/glnpo/glri/GLRI_Slides.pdf (slide 9).

¹² Ibid; pp. 4-5. Plans include Lakewide Management Plans and Remedial Action Plans for Areas of Concern, State Wildlife Action Plans, the Fish and Wildlife Service (FWS) National Fish Habitat Action Plan, the Joint Strategic Plan for Management of Great Lakes Fisheries, the U.S.-Canada Great Lakes Fishery Convention, Partners in Flight North American Landbird Conservation Plans, North American Waterbird Conservation Plan, North American Waterfowl Management Plan, U.S. Shorebird Conservation Plan, Great Lakes Coastal Wetland Monitoring Plan, Great Lakes Fishery Plan, and Endangered Species Recovery Plans.

To accomplish measurable success for the GLRI, we urge the EPA to work with stakeholders to lay out a reformed regional structure that implements the Great Lakes Regional Collaboration Strategy through the GLRI in a way that ensures full stakeholder involvement and transparency, while achieving results. This system also must create order and accountability across the 16 Federal agencies that are using over 140 Federal programs to protect and restore the Great Lakes. We ultimately hope that the Administration replaces the previous Administration's Executive Order creating the Great Lakes Interagency Task Force with a new Executive Order that outlines mechanisms for Federal coordination, collaboration, consultation, and oversight.

We also support creating a Great Lakes Leadership Council that replaces existing forums¹³ and is responsible for establishing annual priorities and recommending actions for departments and agencies on the Federal Great Lakes Interagency Task Force. The Council could provide oversight of Federal agencies' execution of this Action Plan and ensure coordination with the local entities implementing the Strategy, among other tasks. Like the Great Lakes Regional Collaboration, the Council should be composed of a diverse array of stakeholders and should include representatives from the Federal government, States, local and Tribal governments, and non-governmental organizations and businesses. We also believe that similar advisory groups should be encouraged within each Great Lakes state, to help set clearly defined priorities and coordinate activities at both the regional and local level.

Additional Comments

While the Action Plan mostly addresses principles we have identified as discussed above, we offer the following additional comments on ways the plan can be improved.

Rely on the recommendations offered in the paper titled "Prescription for Great Lakes Ecosystem Protection and Restoration"¹⁴ when setting the Action Plan's goals, objectives, and principle actions.

This paper, which was endorsed by hundreds of scientists from around the country, clearly establishes the base causes, impacts, and remedies for the damage to Great Lakes health. It concludes that the Lakes are establishing a chain reaction of degradation, that their self-healing mechanisms have been impaired, and that the key to restoring those mechanisms and healing the Lakes is to restore the health of the nearshore coastal communities and key tributaries. The Action Plans' decisions on geographic and funding priorities should follow this paper's conclusions.

Specifically, the paper suggests the following four primary management objectives for the Great Lakes:

1. *Restore and enhance critical nearshore areas, tributaries, and connecting channels.* An ecosystem-based assessment should be applied to identify specific geographic areas and primary stressors where the combination of individual sources of stress have contributed

¹³ For example, Great Lakes Policy Committee, Great Lakes Regional Collaboration Executive Committee

¹⁴ Bails; et.al. 2005. "Prescription for Great Lakes Ecosystem Protection and Restoration," available at , http://www.healthylakes.org/site_upload/upload/prescriptionforgreatlakes.pdf

or are likely to contribute to the degradation of the nearshore and tributary areas. These are areas where ecosystem breakdown is occurring or is likely to occur, and where action is most likely to restore resiliency to the Great Lakes.

2. *Remediate basin-wide sources of stress.* Systematic, basin-wide approaches should be used to manage and mitigate such stresses as invasive species, excessive nutrient inputs, and loadings of sediments/dredged material, toxic chemicals, and microbial pollution. Doing so is critical in preventing new stresses as well as enabling the recovery process.
3. *Protect the functioning portions of the ecosystem from impairment.* Preserve ecosystem components that now are healthy, and those that can be restored or enhanced, through sustainable development practices within the Great Lakes basin.
4. *Monitor ecosystem health.* Building on existing efforts, measure ecosystem health through a set of clearly defined, agreed-upon integrative indicators that can serve to assess current conditions and monitor the progress of restoring the lakes.¹⁵

Ensure that research, monitoring and assessments contribute to the creation of an adaptive management framework and lead to on-the-ground restoration activities.

Congress has strongly emphasized that the GLRI focus on “on-the-ground restoration activities that achieve measurable results.”¹⁶ The EPA has also stated that the emphasis of the GLRI has been placed on “implementation”¹⁷ and should be “action-oriented.”¹⁸ At the same time, the Action Plan does not clearly outline how the proposed research, monitoring and assessment activities will be integrated with restoration activities. (The importance of monitoring for establishing baseline conditions is noted in the plan, and in some cases, a direct link between research and restoration goals is identified.)¹⁹ The Action Plan should explicitly link new method development, monitoring and assessments to restoration activities.

There are benefits to supporting method development, monitoring and assessments within an adaptive management framework that ultimately lead to implementation. First, doing so helps establish the long-term need of the GLRI by outlining activities that can be undertaken in the future. Focusing on funding entire projects (from planning, design, implementation, and monitoring) is a more holistic approach, far superior to just focusing on pieces of projects without guarantee that each stage will be successfully completed or integrated in the future. Second, linking these activities to implementation will help the Great Lakes community learn what works and what doesn't work, thereby providing the foundation to adaptively manage the resource at hand. Third, assessments are vital to planning the proper scope of a project while monitoring is critical to evaluating progress and success. Lastly, this approach will provide a clearer role for the scientific community (e.g., Federal scientists, academicians) in implementing the Action Plan than what currently is outlined.

In addition to identifying goals and objectives, include a budget estimate on how much funding will be needed to accomplish the Action Plan's principal actions.

¹⁵ Ibid. Pages 2 and 13-15.

¹⁶ Senate Report 111-038 – Department of the Interior, Environment, and Related Agencies Appropriations Bills, 2010. [http://thomas.loc.gov/cgi-bin/cpquery/R?cp111:FLD010:@1\(sr038\)](http://thomas.loc.gov/cgi-bin/cpquery/R?cp111:FLD010:@1(sr038))

¹⁷ EPA Congressional Budget Justification: 2009; page 293. http://www.epa.gov/budget/2010/tab_04_epm.pdf#page=113

¹⁸ EPA's public presentation found at http://www.epa.gov/glnpo/glri/GLRI_Slides.pdf (slide 8).

¹⁹ See for example EPA. 2009. Great Lakes Multi-Year Restoration Action Plan. project selection discussion on p. 6, and discussion on research involving Cladophora, hazardous algal blooms, and botulism on p. 18.

Providing budget estimates that are linked to the Action Plan's activities will help define what is needed to achieve its objectives, assist with long-term planning, and explicitly identify the overall cost and subsequent economic benefit of making these types of investments in Great Lakes restoration. We also urge that the Action Plan include greater detail on the wide variety of programs that may be outside the scope of the GLRI (e.g., Land and Water Conservation Fund) but may be leveraged to enhance GLRI-supported activities.

Ensure short-term and long-term success of the GLRI by supporting technical assistance and greater public education and outreach.

As stated above, the EPA has said at this summer's public meetings that it will take all stakeholders working together to make this year's budget initiative a success.²⁰ However, as noted previously, many local groups, including many watershed groups that do on-the-ground restoration work, have staff limitations and have reduced capacity to apply for and manage grants for the additional work contemplated in the upcoming fiscal year. Groups such as these need assistance in the development of grant proposals and for managing both the grant itself in addition to any reporting requirements. We urge the EPA to build these services into its Action Plan and the GLRI so staff (preferably someone in each Great Lakes state) can work with local non-governmental partners to facilitate grant proposals and reporting.

We also strongly encourage the EPA to work with its Federal partners to simplify paperwork requirements for groups applying for grants. The GLRI's fiscal year 2010 budget shows 16 Federal agencies receiving funding under the new initiative.²¹ Each agency has different requirements when applying for grants, a heavy administrative burden on non-governmental organizations, States, municipal governments, and others. We urge EPA to either consolidate the number of agencies receiving funding in future years, or streamline the paperwork requirements to keep these burdens to an absolute minimum.

We also believe that the Action Plan should more explicitly acknowledge the importance of public participation, education, and outreach by funding these activities and building into the anticipatory request for proposals²² requirements that help get citizens involved. Citizen involvement is not new to Great Lakes restoration efforts.²³ By explicitly identifying opportunities for expanded public outreach and education in both the GLRI and the Action Plan, this effort can help build broad public support for the GLRI now and in the future and create a public that sees itself as a vital participant in restoring the Great Lakes.²⁴ There are organizations that can help reach millions of Americans about the importance of Great Lakes restoration and what individuals can do to help (e.g. the region's zoos and aquaria); the plan should take advantage of these types of institutions.

²⁰ EPA's public presentation found at http://www.epa.gov/glnpo/glri/GLRI_Slides.pdf (slide 8).

²¹ EPA: "Great Lakes Restoration Initiative Proposed 2010 Funding Plan." Page 5

²² We support issuing an anticipatory request for proposals before Congress enacts final funding levels each year.

²³ Remedial action plans for Areas of Concern, for example.

²⁴ For example education on stopping the spread of invasive species or the connection between fertilizer use on their lawn and the contribution to dead zones, etc.

Lastly, the GLRI also should include an investment in youth and school-aged science education programs that meet applicable state standards. Such programs must also include teacher training that comply with initial and continual certification standards. Achieving and sustaining Great Lakes restoration will be a continual process, and a modest investment in science-based Great Lakes educational programs will prepare this and future generations to deal with and manage existing and future Great Lakes stewardship challenges.

Ensure that long-term restoration is not undermined by inadequate rules or regulations.

It is important that long-term restoration not be undermined by inadequate rules. For example, concerning invasive species, the success of the Action Plan and the GLRI as a whole will be undermined if EPA and other regulatory agencies fail to eliminate invasive species in the ballast water of commercial vessels. The EPA has the authority under the Clean Water Act, and the Coast Guard under the National Invasive Species Act, to establish new rules that would require commercial vessels to treat their ballast water and prevent new aquatic invasive species from invading the Great Lakes and causing millions of dollars of damage to the environment. Any plan must spell out how existing authorities plan to eliminate the threat of invasive species.²⁵

We also believe that the Action Plan should protect the public's right to access the Great Lakes. An effective way of demonstrating results is allowing the public to access the lakes themselves. We urge the Action Plan to reflect this sentiment and ask EPA to consider access of the public as one element to consider when making funding decisions.

Create an independent accountability mechanism.

The Action Plan says that the Federal government will collect information and report on progress towards the goals and interim objectives of the GLRI: "EPA will work with the Interagency Task Force to routinely track, measure, and report progress pursuant to the Great Lakes Restoration Initiative." We believe that an independent evaluator of success is needed. We urge EPA – working with stakeholders – to identify an existing institution that can provide a regular independent evaluation on the success or failure of the Federal government on achieving its goals under the GLRI.

We also have specific comments on the "Focus Area Problems, Goals and Measures of Progress" section of the draft Action Plan:

- Toxic Substances and Areas of Concern:
 - The Action Plan needs to include interim objectives for other chemicals, in particular mercury (including a target for eliminating variances for point source discharges) and dioxins (including reductions in releases from open burning, and development of improved inventories)
 - The Action Plan needs to include a principal action (e.g., reference the development of a strong federal rule) that addresses mercury deposition from power plants.

²⁵ Eliminating the threat of invasive species requires EPA to set standards, like those in California and New York, which are 1000 times higher than current international standards.

- The Action Plan should clarify whether the 2014 target of 7 millions lbs. of contaminated sediment remediated is cumulative from the original program's inception, or additional (beyond the 2007 baseline); the latter would be preferable, given the significant extent of contaminated sediments remaining in place.
- Invasive species:
 - The Action Plan needs to include a principal action that creates a regulatory framework for eliminating invasive species in ballast water.
 - The Action Plan needs an interim objective that articulates a goal of eliminating invasive species in ballast water discharges by a date certain.
 - The Action Plan needs to reference organisms in trade, the need for a comprehensive federal screening policy, and the potential for regional action (e.g. development of a screening system and coordinated state moratoria), in the absence of federal legislation.
 - The Action Plan should mandate completion by 2012 of work under the GLRC's recommendation for a comprehensive study of options for permanent hydrological and/or biological separation of the Great Lakes and Mississippi River systems to prevent the introduction of Asian carp and other aquatic organisms into the Great Lakes.
- Nearshore health and nonpoint source pollution:
 - The Action Plan should take into consideration a holistic watershed approach in order to ensure maximum benefits for nearshore areas.
 - The Action Plan needs an interim objective on the acreage of buffer strips protected or restored.
 - The Action Plan needs earlier deadlines to begin implementing and assessing effectiveness of measures to control pollution affecting beaches
 - The Action Plan should reference research in support of high priority beach monitoring needs (including rapid testing, standardization, and microbial source tracking).
- Habitat and wildlife protection and restoration:
 - The interim objective for wetlands is much too low. The GLRC Strategy identified a short-term goal of restoring/protecting 550,000 acres. In addition, increased acreage of buffer strips (as noted above) will contribute to habitat and wildlife restoration.

The Action Plan needs to include an objective ensuring protection of habitats from unnatural regulation of lake levels and emergent habitat due to lake level declines due to climate change.

- Accountability, monitoring, evaluation, communication, and partnerships:
 - The Action Plan should explicitly recognize and include efforts to support research that can ensure more effective restoration actions over time. While restoration efforts should be initiated immediately, additional research will lead to more cost-effective restoration and sustained productivity.
 - The Action Plan should ensure that efforts to refine science-based indicators build on the numerous indicators that have already been developed or proposed, and ensure that the chosen indicators best provide information on ecosystem health, ranging from the more local to lakewide and basin scales.
 - The Action Plan should ensure adequate coordination among all relevant existing entities involved in monitoring, including the Great Lakes Observing System (and separately, spell out in greater detail what is intended with the Coordinated Science

- Monitoring Initiative, which may potentially address a longstanding need for better basin-wide coordination on monitoring).
- As previously noted, in addition to agreements identified in the Action Plan concerning partnerships, the importance of active involvement of all non-federal agency parties (including Tribal representatives, industry, NGOs, and the general public) in restoration efforts should be specifically noted.

Conclusion

We appreciate the opportunity to provide these comments. If you have any questions, please contact Chad Lord, our Coalition's policy director, at 202-454-3385 or clord@npca.org.

Sincerely,

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