



Healing Our Waters-Great Lakes Coalition

July 29, 2014

The Honorable Gina McCarthy
Administrator, Environmental Protection Agency
Chair, Federal Great Lakes Interagency Task Force
U.S. Environmental Protection Agency
Washington, DC 20460

Re: Comments on the Great Lakes Restoration Initiative Action Plan II Draft

Dear Administrator McCarthy:

On behalf of our over 115 member organizations, the Healing Our Waters-Great Lakes (HOW) Coalition would like to thank the federal agencies responsible for the implementation of the Great Lakes Restoration Initiative (GLRI) for your exhaustive work to build a strong, healthy program that is steadily producing results across the Great Lakes region. EPA and the Interagency Task Force have listened to the needs of the region, investing in top priorities in targeted geographical areas to clean up Areas of Concern, and reduce runoff causing toxic algae blooms.

Great Lakes restoration efforts are improving the lives of millions of people and work is continuing on projects throughout the region that will restore the Great Lakes and address the most urgent problems facing them. These projects are cleaning up drinking water flowing to millions of homes and thousands of industries and improving infrastructure important for future economic growth in the eight-state region of Minnesota, Wisconsin, Illinois, Indiana, Michigan, Ohio, Pennsylvania and New York. These projects are delivering results throughout, including fish and wildlife returning to places after decades-long absences; businesses emerging and thriving on restored waterfronts; and people fishing, kayaking, and swimming in restored waterways.

Our comments below are in response to the request from the Federal Great Lakes Interagency Task Force for stakeholder views on the draft GLRI Action Plan II that was released to the public on May 30, 2014.

Comments

First, we continue to believe that the investments of the GLRI must not be undermined by poor policy choices made as part of any regulatory process. Congress has graciously provided more than \$1.6 billion for over 2,000 projects to clean up toxic hot spots, restore wildlife habitat, and keep beaches open, among many other important activities. Policy choices on a range of activities can either support or undercut restoration progress made under the GLRI, speed up or delay results, and lead to efficient or inefficient uses of the limited resources entrusted to the region. For example, EPA's proposed rule clarifying jurisdiction of the Clean Water Act, which we support, can benefit the water quality in the lakes, but only if the rule is not weakened when finalized. Continuing to dispose of dredge material in the open waters of Lake Erie can undermine attempts to end algal blooms there. Unchecked energy development can lead to water impairments that reverse water quality or habitat improvements. Inadequate ballast water regulations could lead to new aquatic invasive species, dealing a blow to the ongoing work of managing and controlling impacts from existing invasive species throughout the region. We encourage the Federal Interagency Task Force to not ignore these issues and to view them as part of the restoration agenda. We

continue to urge the Task Force to describe how it intends to enhance rather than undermine GLRI investments through policy decisions as part of the new updated plan.

Second, while we appreciate the attempt at making the plan more user friendly and better designed, we believe important information was lost. The first action plan included a problem statement in each focus area before describing that area's long-term goals and objectives. We do not believe that the new action plan must provide a recitation of all the problems facing the Great Lakes. However, we believe it is important for the updated plan to 1) describe what actions were taken in the first five years (which this plan does well), 2) describe the impacts those actions have had on the problems the Great Lakes face, and 3) explain why the actions being proposed under the new action plan will address these existing or new problems facing the Great Lakes. We hope the new action plan can be updated to reflect this outline.

In addition, the first action plan did a poor job of integrating what we know to be the impacts of climate change on the Great Lakes system. Providing the overview we suggest above allows the new action plan to better describe how climate change will exacerbate the problems each focus area is attempting to address. We want to see this discussion in each focus area and not isolated to the discussion of cross-cutting issues.

Third, we think the new action plan should better describe how the work to be undertaken under the new action plan will help the United States meet its obligations under the Great Lakes Water Quality Agreement. The region is coordinating its work among various plans, and the last action plan did a decent job at integrating all these plans through the implementation of GLRI grants. The GLWQA remains detached, however, from this action plan. We see the GLRI as the United States' commitment to achieving the shared objectives under the GLWQA and believe the new action plan should provide clearer linkages towards its implementation. This is especially true for the new action plan's measures of progress, which we address below.

Fourth, we are pleased to see the incorporation of a science-based adaptive management framework into the draft action plan. Such a framework can potentially be used not only in prioritizing areas and problems, but also in assessing progress (both in aggregate and project level, and as part of an iterative process to improve restoration outcomes). However we still believe improvements are warranted in developing and implementing such a framework:

- The plan should clarify whether there will be a separate implementation plan for the adaptive management framework (or whether this will be incorporated into an annual planning document). Creating a specific plan will provide greater assurance that all key components of the framework are incorporated into program and project implementation and evaluation.
- The action plan should emphasize more the importance of experimentation and learning in the adaptive management process as applied through the GLRI. This would include a greater emphasis on environmental outcomes (rather than simply activity measures) and more efforts involving user-driven research, monitoring, assessment, and other relevant components. This is a difficult task, but there may be lessons available from outside the basin, including as identified in a National Research Council committee report on Chesapeake Bay restoration (*Achieving Nutrient and Sediment Reduction Goals in the Chesapeake Bay: An Evaluation of Program Strategies and Implementation*).
- The importance of monitoring is recognized in the draft action plan (including in specific focus areas and in noting annual Great Lakes monitoring will be conducted). We still believe there should be greater specificity in regards to monitoring, including at the project level. The broad synoptic Great Lakes coastal wetland monitoring project is providing invaluable data on coastal wetlands, but it is important that the framework highlight the importance of ongoing monitoring

of these important habitats and other key components of the ecosystem. It is also important to recognize that some monitoring efforts may need to be added or modified in order to be optimized to assess restoration success. GLRI funding may need to be available to allow groups implementing on-the-ground projects to assess the outcomes of their projects on the long-term health of the Lakes. At this time, many groups do not have the resources needed to track progress outside of GLRI funding.

- The draft action plan references seeking input from the Great Lakes Advisory Board (GLAB) and the scientific community, but it is still not clear if there will be any formal mechanisms for funding the requisite science needed to effect solid evaluation of outcomes and implementation of adaptive management. Such mechanisms are needed and should be identified in the action plan.

Fifth, in tracking progress, it is obviously necessary to have adequate environmental indicators in place. Within the Great Lakes, we have 20 years of development and implementation of State of the Lakes Ecosystem Conference (SOLEC) indicators, as well as recently recommended International Joint Commission ecosystem indicators. These efforts have shown that development of indicators is not a trivial task with characteristics such as purpose and ability to be communicated effectively among issues to be considered.

While we appreciate the challenge faced in trying to determine good, reliable measures of progress, we believe that the draft plan needs to re-evaluate the use of “number of projects” as a measure, which it has used in a number of areas. Counting the number of projects funded with GLRI funds is easy, and we can imagine that the types of projects funded will likely be ones that lead to positive environmental outcomes. However, there is too much uncertainty left in such an approach. Billions of dollars have been entrusted to the region and we want to ensure those resources are well spent towards achieving the ecological responses we all want to see. Therefore, we believe the measures of progress must be linked to quantifiable, numeric ecological goals. This could be as simple as linking the action plan’s measures of progress to appropriate indicators, including indicators that can help identify effectiveness of restoration actions, whether from SOLEC, the IJC (which is our preference), or both.

Sixth, the action plan should be clearer on the role of general public and the academic community involvement in the process, including offering more involvement in goal-setting and program development and evaluation (e.g., through the GLAB and otherwise), rather than only emphasizing input and consultation later in the process (e.g., delisting beneficial use impairments in an Area of Concern). Such involvement and broader education on the Great Lakes ecosystem can also help in sustaining interest in and support for restoration efforts, as well as documenting positive environmental outcomes, in particular in cases where response times are longer (again, as noted in the aforementioned Chesapeake Bay report).

Similarly, the draft action plan appropriately highlights the importance of environmental education and stewardship. In addition to focusing on educator training, the action plan could highlight the potential for these and other efforts to engage student groups in active involvement (where appropriate) in local restoration efforts, ranging from studying nutrient management in agricultural watersheds to approaches to habitat restoration in more urban areas.

Seventh, we like that the action plan continues to stay focused on five areas: cleaning up toxics and Areas of Concern, combating invasive species, promoting nearshore health, restoring wetlands and other habitat, and science-based adaptive management. We also continue to support maintaining a special emphasis on the new action plan’s principal initiatives “Remediate, restore and delist Areas of Concern”, “Control established invasive species”, and “Reduce nutrient loads from agricultural watersheds.” These areas continue to be the biggest sources of stress for the Lakes, contributing to what scientists have described as “ecosystem breakdown...where intensifying levels of stress from a combination of sources have

overwhelmed the natural processes that normally stabilize and buffer the [Great Lakes] system from permanent change.” (Bails, et.al. 2005) These three priority areas reflect the causes of this ecosystem breakdown because they either represent the severe historic damage caused to the lakes nearshore (AOCs) or the ongoing stresses from human-induced sources (invasive species or nutrient pollution). We believe that it is appropriate for the GLRI to continue prioritizing them, especially since the problems they represent took decades to develop and in many cases will take decades more of focused attention to solve.

However, as we have stated before, we provide this caveat: while the special focus on AOCs, nonpoint runoff, and invasive species to date has been important, they are not the only problems or stresses facing the Lakes. We expect the GLRI action plan to fund activities in all areas as a prescription for recovery.

We appreciate the opportunity to provide these comments. Please do not hesitate to contact Chad Lord, our Coalition’s policy director, at (202) 454-3385 or clord@npca.org with questions.

Sincerely,

Joel Brammeier
President
Alliance for the Great Lakes

Mike Strigel
Executive Director
Gathering Waters Conservancy

Katie Rousseau
Director, Clean Water Supply
American Rivers

Mike Leahy
Conservation Director
Izaak Walton League of America

Brian Smith
Associate Executive Director
Citizens Campaign for the Environment

Mark Owens
President, Austin Chapter
Izaak Walton League of America

Michael Griffin
Executive Director
County Executives of America

John Crampton
President – Bush Lake Chapter
Izaak Walton League of America

Jean Pogge
CEO
Delta Institute

Jill Crafton
Chair, Great Lakes Committee
Izaak Walton League of America

Gildo Tori
Director of Public Policy
Ducks Unlimited, Great Lakes/Mid-Atlantic
Region

Ivan J. Hack, Jr.
President, Headwaters Chapter
Izaak Walton League of America

Howard Lerner
Executive Director
Environmental Law & Policy Center

Mark Owens
Vice President, Minnesota Division
Izaak Walton League of America

Jill Ryan
Executive Director
Freshwater Future

Sandy Bihn
Executive Director
Lake Erie Waterkeeper Inc.

Nancy G. Brown
President
League of Women Voter of Ohio

Jennifer Clark
Interim Executive Director
Michigan United Conservation Clubs

Irene Senn
Coordinator
Religious Coalition for the Great Lakes

John J. Ropp
President/CEO
Michigan Wildlife Conservancy

Merritt Frey
River Habitat Program Director
River Network

Cheryl Nenn
Riverkeeper
Milwaukee Riverkeeper

Nicole Barker
Executive Director
Save the Dunes

Scott Strand
Executive Director
Minnesota Center for Environmental Advocacy

Lee Willbanks
Executive Director
Save the River

Gary Botzek
Executive Director
Minnesota Conservation Federation

Suzanne Moynihan, SSND
Director
The EDGE (Education Dreams for a Green Era)

Steve Morse
Executive Director
Minnesota Environmental Partnership

Lisa Brush
Executive Director
The Stewardship Project

Christine Goepfert
Acting Regional Director, Midwest Region
National Parks Conservation Association

Christine Chrissman
Executive Director
The Watershed Center Grand Traverse Bay

Karen Hobbs
Senior Policy Analyst
Natural Resources Defense Council

Jennifer McKay
Policy Specialist
Tip of the Mitt Watershed Council

Andy Buchsbaum
Executive Director, Great Lakes Regional
Center
National Wildlife Federation

Dendra Best
WasteWater Education.org

Kristy Meyer
Director of Clean Water Programs
Ohio Environmental Council

Ellen Satterlee
CEO
Wege Foundation

Don Hollister
Executive Director
Ohio League of Conservation Voters

Ray Stewart
President
Ohio Wetlands Association