



May 24, 2019

Chris Korleski
Director, Great Lakes National Program Office
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604

Dear Mr. Korleski:

On behalf of the Healing Our Waters-Great Lakes Coalition, I submit these comments on the draft Great Lakes Restoration Initiative Action Plan III.

General Comments

The Great Lakes Restoration Initiative (GLRI) is an effective program that is producing results in the states of Minnesota, Wisconsin, Illinois, Indiana, Michigan, Ohio, Pennsylvania, and New York. Management actions at nearly 40 percent of the total Areas of Concern have been completed. The number of farmland acres enrolled in agricultural conservation programs in four priority watersheds has more than doubled. Over 250 million gallons of untreated urban stormwater runoff has been prevented from entering the Great Lakes. Endangered and threatened species such as the piping plover and lake sturgeon are recovering, and coastal wetlands are being restored.

The GLRI action plans have been important guides for federal agencies and our region. They have ensured that federal resources – in partnership with other governmental and non-governmental partners – stayed focused on the biggest threats facing the Great Lakes. Their development also set an expectation of those in the region that not only would the strategic focus of the GLRI be informed by many diverse stakeholders in the region, so too would its operationalization and implementation.

We commend the EPA and the other federal agencies for carrying out regional outreach to develop the draft for the GLRI Action Plan III. We appreciate the time the federal agencies took to listen to people throughout the region last summer. It appears that what you heard is reflected in the current draft.

We also appreciate the consistent formatting and structure of the plan. It's an often-overlooked detail, but it provides the public with a familiarity that hopefully helps with their assessment of what's been proposed. We also appreciate the comparison document that accompanies the draft plan - a thoughtful contribution for public participation.

We also like the ongoing integration of climate resiliency more thoroughly in the current draft. The Great Lakes climate is changing and the increased variability in rainfall, snow, lake levels, temperature, and other indicators, which scientists predicted a decade or more ago, is now coming true with increasing consequences to the region's communities, environment, and economy. The Fourth National Climate Assessment, published last year, said that "Restoration of natural systems [in the Midwest], increases in the use of green infrastructure, and targeted conservation efforts, especially of wetland systems, can help protect people and nature from climate change impacts" (p. 874). The GLRI is

taking the steps necessary to help the region adapt to climate change. Intentionally and fully integrating climate change impacts into the Action Plan strategy and its implementation over the next five years is vital.

In addition to the general comments above, we offer our thoughts for each section.

Introduction (pages 1-2)

First, the draft of the action plan now out for public comment continues to focus on the biggest threats to the Great Lakes. Sixty percent of Areas of Concern still need to be cleaned up. Emerging contaminants are creating new threats to public health. Aquatic and terrestrial invasive species continue to damage the Great Lakes environment and agricultural and urban runoff continue to pollute waterways. We still have lost too much habitat and there is a lot more work to prepare for if we are truly going to protect and restore the Great Lakes. We have much more work to do.

Second, we appreciate seeing the principles for GLRI planning and implementation now expressly identified as part of this plan. It is a level of transparency that action plans I and II lacked. As noted in the summary document that accompanied the draft plan, previous plans addressed these principles only obliquely, if at all. Their inclusion is welcome. In particular, we appreciate an emphasis on communication and outreach, the integration of existing plans and nonfederal stakeholder consultation, project sustainability, and adaptive management in order to set up future restoration and protection actions.

However, we suggest a few changes in order for the principles to better reflect the Healing Our Waters-Great Lakes Coalition's priorities. First, reporting is a function of accountability. We suggest the first two principles be combined. Second, we also encourage the GLRI agencies to think about how to integrate a principle around equity. Ensuring a diversity of projects and programs that respond to the needs of diverse communities across the region is vital, especially if the ecological benefits from the GLRI are to be shared with everyone in the region. Third, we believe that protection of the resource demands a "first, do no harm" approach. We urge regulatory compliance be acknowledged along with the implementation of voluntary actions identified and communicated in the action plan and other plans that were highlighted. Fourth, innovation should be embedded in the work undertaken by the GLRI. Cutting-edge techniques and technologies should be utilized in addressing Great Lakes problems. The region can lead the nation by sharing the results from this forward-thinking approach. Lastly, we encourage the plan to include a principle that acknowledges that projects may benefit multiple focus areas because the co-benefits and cross-benefits of projects in one focus area could have, and likely will have, on achieving the goals, objectives, and commitments in other focus areas. The introduction acknowledges the interrelated nature of many Great Lakes issues. We believe that acknowledgement should be an operating principle in order to inform grantmaking and other planning and implementation.

Focus Area 1: Toxic Substances and Areas of Concern (pages 5-8)

We have seen tremendous progress in addressing toxic contamination in the region's Areas of Concern. Federal agencies and their state and local partners have accelerated cleanups because of GLRI investments. As the draft plan points out, seven times the number of Beneficial Use Impairments—the cleanup benchmarks used to determine progress in AOCs—have been removed since the GLRI began. Three AOCs have been delisted under the GLRI. Eight more are on track for delisting. Even with this success, 19 AOCs remain contaminated, which affects wildlife and the public's health. Maintaining a focus on AOC cleanups makes sense.

The draft action plan sets aggressive yet reasonable goals for cleaning up AOCs. We particularly appreciate the benchmark that sets out the goal for completing cleanup plans for all remaining AOCs by the end of FY2024. These plans are critical for setting up future action and laying out a clear path to what steps are necessary to delisting all remaining AOCs, the goal of the AOC program. For the ten AOCs listed where all management actions could be undertaken, we urge the final Action Plan to be as specific as possible regarding which five AOCs will be targeted.

The focus on other toxic contamination also continues to make sense, especially as new chemicals of concern are being discovered. For example, PFAS and PFOA are two chemicals that have rightfully caused deep concern among the public given these chemicals' impact on public health. We appreciate the draft plan's commitment to filling critical data gaps for Annex 3 and other priority chemicals. However, we urge the plan to be more specific as to which chemicals it will focus on and how this plan will take advantage of work already being undertaken by EPA and other agencies to monitor some of the chemicals listed. For example, EPA is already focused on PFAS as are other federal agencies. We encourage the action plan to be more specific on what this plan will look at and how it will leverage work in areas of common interest in order to expand the GLRI's impact. Lastly, we urge the plan to not stop at just evaluating and reporting on the discrete science and assessment activities to which it commits. Instead, we urge the draft plan to also commit to helping the region identify plans of action for addressing potential public health threats caused by these chemicals of concern.

Invasive Species (pages 9-14)

We support the draft plan's focus on preventing new invasive species from establishing self-sustaining populations in the Great Lakes. The focus on increasing the effectiveness of existing surveillance programs by increasing detection abilities through different techniques and technologies makes sense as does supporting risk assessments that identify new invaders and their likely pathways of invasion. As the plan notes, this work provides the federal agencies and state and tribal partners with information necessary to allocate resources and attention on the most urgent threats. This is especially true for the ongoing attention to the Asian Carp Regional Coordinating Committee, which requires continuing financial and logistical support.

However, prevention of new species will not address those terrestrial and aquatic plants and animals already in the region. The focus on controlling existing species and then restoring sites – on both public and private land – that are degraded by aquatic and terrestrial invasive species is work that must continue to be a focus of this plan. The focus on advancing the resiliency of GLRI projects is also noted and appreciated.

Lastly, we like the focus of the draft plan's ongoing support for the development and enhancement of technologies to control Great Lakes invasive species. Moving from testing new techniques and technologies to implementing them in the field is exactly what the GLRI should encourage and support. The invasive species collaboratives supported by the plan also help communities enhance communication about the latest control techniques and support rapid response to emerging threats.

While we generally support the prevent-control-communicate framework in the draft plan, we encourage more intentional, focused discussion about how the GLRI will coordinate with the new Great Lakes invasive species monitoring program recently authorized under the Vessel Incidental Discharge Act. Two new invasive species have been discovered in the last few years – likely from ballast water discharge – and it is imperative that confronting ballast water invaders in a coordinated, effective way is prioritized. We also urge more recognition of ballast water's threat under both the GLRI's prevention and control commitments. Lastly, because acreage controlled may not be a sufficient indicator for Asian carp

and other invasive species, we urge the plan to consider inserting a second measure of progress that better matches what is required for those species, such as fish biomass removed or treated.

Nonpoint Source Pollution (pages 15-20)

Agricultural and stormwater runoff continues to present the region with one of its biggest challenges. The public health, environmental, and economic concerns from what runs off farm fields and city streets are well known. The drinking water crisis in Toledo, Ohio, in 2014, is a stark reminder that runoff from industrial agriculture is a serious threat to our drinking water, recreation, and economy. The GLRI has rightfully prioritized addressing them in the past two action plans and we support an ongoing emphasis in dealing with this issue in the new draft.

The number one cause of harmful algal outbreaks is runoff from farms. Preventing that runoff is a key strategy to reducing harmful algal blooms to more normal levels, which is why we appreciate the progress made in doubling the number of agricultural lands enrolled in conservation programs. We appreciate that the GLRI has targeted four watersheds for where to invest GLRI runoff-reduction resources and encourage the new plan to maintain this focus.

Cities and coastal areas are also struggling with runoff issues. Untreated stormwater contaminates beaches and drinking water supplies and aging stormwater infrastructure can cause neighborhood flooding and public health concerns. We fully support the action plan continuing to accelerate the adoption of nature-based infrastructure projects to reduce the impact of polluted runoff on nearshore areas. Watershed management projects are also important in helping stabilize streambanks, increase forest cover, and construct wetland meadows, among other efforts, which increase resiliency in and around our communities.

Actions such as increasing conservation practices on farm fields, supporting nature-based infrastructure in neighborhoods, re-establishing riparian vegetation, or stabilizing streambanks also have other benefits beyond reducing runoff. These projects add to greenspace in urban areas, create habitat for pollinators and other wildlife, reduce basement flooding, and beautify communities creating increased pride of place. Because there are so many co-benefits to these projects, we encourage the plan to assess and measure how the work undertaken in this focus area achieves the goals in the others.

In addition, while we appreciate the focus areas' objective to improve the effectiveness of non-point source control efforts, we believe measures of progress need to have a clearer connection to outcomes rather than just tracking how many tools were evaluated or activities assessed. We urge the plan to connect the practices promoted, acres conserved, and investments made to reduce agriculture and stormwater runoff to downstream water quality benefits so the region can better account for progress. The bottom line is that actions to reduce non-point pollution need to result in measurable pollution-reductions that make the Great Lakes and their tributaries cleaner.

Habitat and Species (pages 21-24)

Habitat improvements are evident throughout the Great Lakes because of the GLRI's investments. Thousands of miles of rivers and streams have been cleared of dams and barriers resulting in fish swimming into stretches of river where they've been absent for decades. Habitat connectivity continues to improve as the Fish and Wildlife Service, National Park Service, Natural Resources Conservation Service, and National Oceanic and Atmospheric Administration work with partners to restore, protect, or enhance over 200,000 acres of wetlands and other habitat. The results are clear: the piping plover are being brought back and lake sturgeon are increasing.

However, we have a long way to go if we are to restore anywhere near the wetlands and other habitat necessary for healthy ecosystems for fish, wildlife, and people in the region. The draft plan identifies over 1.5 million acres of coastal wetland and nearshore habitats that should be restored; we've only met a quarter of that goal with projects already undertaken.

In order to make additional progress, we support the draft plan's focus on protecting and restoring communities of native aquatic and terrestrial species important to the Great Lakes. We also like the increased focus on boosting resiliency of species through comprehensive approaches. While habitat and species are the focus of this particular area, their restoration is achieved throughout this plan. The region restores habitat when it cleans up AOCs, controls invasive species, or stops polluted runoff. We urge this plan to explicitly recognize the inter-disciplinary nature of habitat restoration and protection by not only collaborating between GLRI invasive species and habitat restoration activities, but also between non-point and coastal health as well. We also urge the plan to mention the importance of consulting with State Wildlife Action Plans to deepen the collaboration between the federal and state agencies. We also encourage the plan to list species of waterfowl, like the American black duck, and breeding marsh birds as species that should benefit from the GLRI. Lastly, we encourage the plan to include benchmarks for conserving land for habitat through acquisition as an effective strategy towards meeting the action plan's goals.

Foundations for Future Restoration Action (pages 25-28)

Although the GLRI has always been designed as a catalyst for action, we appreciate the purpose of the last focus area. Creating a foundation for future restoration actions ensures that we're prepared to put the financial resources that the U.S. Congress and other state, tribal and local governments contribute to achieving the GLRI's goals. As noted earlier, we support an adaptive management principle that underlies all the work throughout the draft plan. To do this successfully, the federal agencies – working with their academic and nongovernmental partners – must monitor the health of the Great Lakes at different scales, as noted in the plan. We agree that the agencies must also develop new tools for monitoring and forecasting. Although developing these tools is important, we urge the federal agencies to more clearly describe how the federal agencies will support and coordinate this work with the region's colleges, universities, and nongovernmental partners and between themselves. We also urge the plan to prioritize investing in a geographically robust and innovative monitoring network. Such an infrastructure investment now would provide the kind of detailed and ongoing data to allow the federal agencies and their partners to know what's working, what's not, and what changes to the program need to be made, thereby putting in place the adaptive management infrastructure we need for the next decade or more.

As the region uses the information gathered from a comprehensive network, we also urge this plan to consider focusing on prioritizing technical assistance in each focus area for states, tribes, cities, and non-governmental partners in order to set up the next generation of restoration work. Helping non-federal entities plan for the future prevents any gaps in progress as long as increased funding is budgeted for the GLRI each year of the plan.

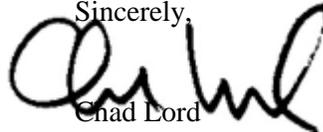
Lastly, preparing the region to participate in the implementation of the GLRI is also important. Getting youth into the region's national parks, refuges, and other public lands and waters creates the next generation of project implementers. However, when teachers bring young people to the lakes, we urge this plan to describe how the curriculums and other citizen science that the Great Lakes Sea Grant Network, National Oceanic and Atmospheric Administration, National Park Service, and others undertake can contribute to the monitoring of GLRI progress throughout the region. Doing so leverages both the education of young people while potentially providing valuable information for future decisions.

Conclusion

The GLRI is producing results. One reason is because the program's resources are targeted based on region-wide planning and shared goals. The GLRI Action Plan III will continue to ensure that the federal agencies are focused and accountable in achieving the restoration and protection goals for the more than 30 million Americans that rely on the Great Lakes for their drinking water, jobs, and way of life.

Thank you for the opportunity to offer 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,

A handwritten signature in black ink, appearing to read "Chad Lord", written over the printed name.

Chad Lord
Policy Director