



NATIONAL WILDLIFE FEDERATION®
Great Lakes Regional Center
213 West Liberty Street, Suite 200
Ann Arbor MI 48104-1398
734-769-3351
www.nwf.org

Mr. Thomas Carpenter, Designated Federal Officer
U.S. Environmental Protection Agency
Science Advisory Board
Mailcode 1400R
1200 Pennsylvania Ave., NW
Washington, DC 20460-4164

July 11, 2011

Re: Science Advisory Board Panel for Review of Great Lakes Restoration Initiative Action Plan

Dear Mr. Carpenter and Science Advisory Board Panel,

On behalf of the National Wildlife Federation (NWF), I appreciate the opportunity to provide brief comments as the Environmental Protection Agency (EPA) Science Advisory Board Panel for Review of Great Lakes Restoration Initiative Action Plan (“Panel”) begins its work. NWF has had a long involvement in promoting efforts to protect and restore the Great Lakes, including working with other NGOs, states, federal agencies, industry, and Canadian partners (work that has included co-founding and working extensively with the Healing Our Waters Great Lakes Coalition and its 100-plus member organizations).

We have been very pleased to see the Great Lakes Restoration Initiative (GLRI) become a reality over the past two years, with new funding provided across five program areas which built on the earlier Great Lakes Regional Collaboration Strategy (of which we were also contributors). We are also pleased to see the convening of the EPA Science Advisory Board (SAB) Panel to review the GLRI Action Plan. Given the complexities of the Great Lakes ecosystem and the multiple stresses it is encountering, it is essential that a plan to address the problems be grounded in solid science.

While we believe the Action Plan addresses key stresses facing the Lakes and appreciate the development of the Scientific Background of the GLRI Action Plan document, we believe there is still room for improvement for better integrating science into the overall process. To be sure, there has long been a need for better integration of programs addressing Great Lakes impairments (including scientific assessments and components of the various efforts). The Scientific Background document on the GLRI appropriately references other initiatives, programs and institutions relevant to Great Lakes restoration, such as the Great Lakes Regional Collaboration, the Great Lakes Water Quality Agreement, and the State of the Lakes Ecosystem Conference. Yet while these initiatives, programs, and institutions provide important context for current work, we believe there remains value in considering ways to more systematically incorporate science into the GLRI.

We believe this process could proceed at two levels:

1. Examination of the GLRI at a high level, to assess whether the strategy as a whole (as embodied in the Action Plan) is addressing stresses and pursuing restoration and protection measures that, in aggregate, and based on our current understanding, will lead to optimal improvements in the ecosystem.
2. Examination of the GLRI at a finer scale (such as via focus areas or individual projects) to assess the scientific strengths or limitations therein.

Regarding the higher level analysis, again, it is clear that there has long been recognition of the need to better integrate programs addressing Great Lakes stresses. Initiatives and reports from bodies such as the International Joint Commission's Great Lakes Science Advisory Board and Council of Great Lakes Research Managers have helped identify binational research needs through the years. We also recognize there are inherent difficulties in developing a more strategic scientific approach given the diversity of the ecosystem, the plethora of historic and contemporary stresses, and the numerous researchers, programs, institutions, and jurisdictions operating in the Great Lakes Basin.

At the same time, the value of a more systematic science strategy addressing the Great Lakes ecosystem is clearly warranted, including in assessing the future of the GLRI. Some types of questions relevant to this approach might include:

- Are all key stresses being addressed through the GLRI?
- Should climate change be addressed as an independent stress through the GLRI, or in the context of other major stresses?
- Are there impairments to structure and function in the Great Lakes broadly (or in individual areas) so fundamental that they must be addressed in order to more fully restore the system?
- Are there other impairments or stresses in the ecosystem that should be priorities, given their current or potential impacts?
- Is there adequate information to prioritize restoration and protection efforts for all (or key) impairments or stresses?
- Is there concern with multiple stresses (and/or cumulative impacts) that should be considered in prioritizing restoration efforts?
- What are some of the key scientific uncertainties or knowledge gaps concerning the Great Lakes ecosystem that should be addressed while restoration and protection efforts are underway, and are they being addressed?
- Is it likely that all GLRI activities in aggregate (as currently envisioned) will lead to significant improvements in the Great Lakes ecosystem?

In general, while recognizing the clear need to carry out restoration and protection efforts now, there is clearly a need to more systematically incorporate scientific research into the overall effort, to ensure both improved understanding of the system as well as the ability to adapt programs and efforts as appropriate. Furthermore, while the charge questions to the Panel focus largely on the five focus areas, we believe these types of questions could be addressed in the context of the first three charge questions.

Regarding the first charge question, we believe the Panel should be considering whether all principal actions identified in the Action Plan appear to be adequate (including from a scientific perspective, which may be implied), not simply whether they are consistent with actions/recommendations from previous strategies.

Regarding assessment of the GLRI at a finer scale, again, we believe key scientific questions should be considered more explicitly. For example, on the issue of invasive species (Charge Question 6), the charge question notes that ballast water and Asian carp efforts are being addressed in other fora. Yet for the Asian carp, while the Asian Carp Control Strategy Framework has undergone review and public comment, there may be value in the Panel considering whether further review of the overall approach (e.g., through a separate SAB panel) is warranted. In another example, for Charge Question 9 (on the issue of whether specific activities are considered “restoration” actions), we believe an additional key question is whether the actions properly address impairments to the key functions and processes of concern in the system (e.g., whether they seem to be appropriate based on current understanding of fish and wildlife impairments, but might not be formally considered “restoration” actions).

Finally, for Charge Question 10, there are several components to the fifth focus area within the GLRI, including monitoring and evaluation. While we recognize that an assessment at the project level is beyond the scope of the Panel’s work, it is important to note the importance of both monitoring and evaluation components in individual projects (as well as consideration of the broader effectiveness of the GLRI). We believe the Panel should consider requirements issued in request for proposals to date, plans for the Great Lakes Accountability System, and any other relevant information in identifying ways that monitoring and evaluation could potentially be improved through the GLRI.

In summary, we appreciate the opportunity to provide input on the process being undertaken by the Science Advisory Board Panel for Review of Great Lakes Restoration Initiative Action Plan, and hope the Panel has fruitful deliberations on this important topic.

Sincerely,

Michael W. Murray, Ph.D.
Staff Scientist
734-887-7110
murray@nwf.org