



September 20, 2011

Mr. Thomas Carpenter, Designated Federal Officer
Science Advisory Board Staff Office

Dr. James Sanders, Chair
Science Advisory Board Panel on the Great Lakes Restoration Initiative Action Plan

Dear Mr. Carpenter and Dr. Sanders:

Thank you for the opportunity to provide additional comments on the draft report of your review of the Great Lakes Restoration Initiative (GLRI) Action Plan. The Great Lakes Inter-Agency Task Force (IATF) of federal GLRI departments greatly values these recommendations and appreciates the Science Advisory Board (SAB) Panel's hard work that went into drafting this report. The SAB Panel's review is a critical step in our continued implementation of the GLRI. The following comments are focused on areas where we have clarifying questions or general observations.

We strongly agree with and support the SAB Panel's "basic premise that there is enough known about the issues confronting the Great Lakes, as well as the underlying causes and potential remedies, to implement remedial activities, and agrees that the Action Plan identifies the most important actions that should be undertaken."

We encourage the Panel to prioritize its recommendations, where appropriate. There are dozens of recommendations embedded in the draft, each that could lead to hundreds of actions and activities to ultimately accomplish those recommendations.

We agree with the Panel's ultimate suggestion that "A balance of effort between restoration projects and monitoring of these projects is needed." However, we would like guidance on what this "balance" looks like. Should this balance be a set percentage, as we understand is the case for some multi-agency/multi-jurisdictional watershed management efforts? If so, then how do we determine that percentage? If other ecosystem management regimes use a different way to plan and budget for monitoring, understanding the pros and cons would help.

We would like to SAB Panel to clarify the composition and function of the proposed "standing science panel."

We recognize that a science plan could serve as a useful adaptive management framework for evaluating the effects of restoration projects and as a means to focus on the synthesis and integration of

the restoration results of funded activities. Does the Panel have any specific recommendations on a limited number of appropriate ecosystem integrative measures?

We ask that the SAB Panel clarify what it means by urging the agencies to have an accountability system that “provides transparency.”

We ask that the SAB Panel clarify the relationship between improving the “accountability” system and the proposed GIS framework? The two efforts appear to be complementary.

We would like to inform the SAB Panel that we are proposing to change the beach health measure in the Nearshore Health and Nonpoint Source Pollution focus to “percent of days of the beach season that the Great Lakes beaches monitored by state beach safety programs are open and safe for swimming.” The new measure will more closely reflect the impacts to human health and the national beach health measure.

Thank you in advance for clarifying the potential conflict between recommending that monitoring be integrated (e.g., under the Accountability, Education, Monitoring, Evaluation, Communication, and Partnerships or AEMECP focus area) v. being better addressed in each specific focus area for reasons (which could promote “silos” and seems incompatible with the Panel’s recommendation that the GLRI must take a more integrated approach to planning and evaluation). While each focus area has some monitoring, assessment and evaluation that is singularly related to that focus area (e.g. coastal wetlands monitoring), the intent of monitoring in the AEMECP focus area is on integrating information on the health of Great Lakes ecosystems rather than embedding them in topic-specific programs. There are too many interrelationships between invasive species, nearshore health, toxic substances, and habitats to stovepipe accountability systems in a piecemeal fashion.

Thank you again for the opportunity to provide comments on the draft report of your review of the GLRI Action Plan.

Sincerely,

Cameron Davis
Senior Advisor to the Administrator
U.S. Environmental Protection Agency