



Reply to:
Dale K. Phenicie
Environmental Affairs Consulting
402 Lighthouse Lane
Peachtree City, GA 30269
(770) 487-7585
FAX (770) 631-7729
e-mail: dkphenicie@mindspring.com

September 12, 2011

Mr. Thomas Carpenter
Designated Federal Officer
SAB Staff Office

Carpenter.thomas@epa.gov

Dear Mr. Carpenter:

This letter contains comments, filed on behalf of the Council of Great Lakes Industries, regarding the SAB Panel draft advisory report on the interagency *Great Lakes Restoration Initiative Action Plan FY 2010-2014*. The Council of Great Lakes Industries (CGLI) is an association of industries, including science based organizations that support these industries, with significant interest in the Great Lakes Region. CGLI often serves the function of coordinating technical and scientific reviews and comments on Great Lakes science matters. Personnel engaged in these reviews are science professionals qualified to offer these comments.

Recommendation regarding need for science plan:

CGLI agrees that a solid science plan is needed to drive and guide the Great Lakes Restoration Plan. Much of the restoration work underway and needed in the future within the Great Lakes Basin involves clean-up activities that the Region's industries have been involved with for decades. Industry personnel have participated in, and made significant contributions to, the science work that supports these clean-up efforts. To ensure the best possible application of science to the Great Lakes Restoration effort, industry scientists must have a part in developing the science plan. CGLI requests that the SAB report recommendations include this need to include industry science representatives in the effort to develop the science plan.

Recommendation regarding need for standing science panel:

CGLI agrees that a standing science panel should be seated to provide assessments of progress and provide information needed to guide restoration actions and decisions. To take advantage of the experience and expertise available within the industrial sector, industry scientists should be selected to sit on the science panel. CGLI requests that the SAB report recommendations specify that the science panel should include industry scientists.

The need to understand and account for the roll of all stressors on Great Lakes ecosystems:

As pointed out in the draft SAB report on page 17 it is extremely important to understand, consider and account for the role of all stressors on Great Lakes ecosystems when developing response and restoration strategies. This point is so important that it needs to be highlighted in the cover letter to Administrator Jackson as well as in the Executive Summary. CGLI requests that this conclusion be added to these two summaries of report findings.

Inclusions of social sciences in science evaluations of the Restoration Plan:

CGLI agrees that social sciences must be a part of the science evaluations that guide the Great Lakes restoration efforts. Societal needs for extracting and utilizing resources, habitation, and well being must be a part of the science picture that guides decision making.

Role of regulatory structure in the restoration initiative:

As important as science is in the development, implementation and guidance of the Great Lakes Restoration initiative, the role of non-science factors such as regulatory structure must also be included. This is particularly true in the area of AOC and sediment clean-ups. Most of these efforts are subject to Superfund (CERCLA) regulations. The SAB report needs to acknowledge that this can be a complicating and sometimes conflicting issue. The discussion on page 14 of the draft report would be an appropriate place for this addition.

Restoration of wildlife populations and habitats:

The draft SAB report makes a key point that restoration of wildlife populations and habitats depends on the resiliency of these systems to adjust to disturbances. These disturbances are unavoidable in urban and managed areas even under the best of circumstances. CGLI requests that the SAB report make it clear that Great Lakes restoration initiatives must plan and account for human activities within these restoration areas. Continued utilization of resources, on a sustainable basis, is an important and needed element in the Great Lakes Region.

Concern about Muir/Howard and Brooks/Ankley peer review status:

The draft SAB report makes note of the reliance on “the Muir and Howard analysis” and “Brooks and Ankely 2006” work regarding personal care products and pharmaceuticals. Industry scientists have followed this work and participated in peer review events involving these works. It is extremely important that the application of these models be done in a manner that reflects the critiques that have come from the peer review events. The SAB report must include acknowledgement of this need. For example, a robust collaboration event between several risk assessment scientists that reviewed the Brooks/Ankely work was held by the International Joint Commission SAB Workgroup on Chemicals of Emerging Concern in April of 2010. The proceedings from that collaboration event clearly reflect the comments made by this large group of respected

scientists. The EPA SAB draft report should acknowledge these peer comments on page 16.

CGLI appreciates the opportunity to provide these comments. Please contact me with questions or requests for additional information.

Sincerely,

Dale K. Phenicie,
Projects Director