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*Ensuring environmental and  
economic prosperity for the Great  
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communications, policy research and  
development, and advocacy.*

July 8, 2011

Science Advisory Board Panel on the Great Lakes Restoration Initiative Action Plan  
c/o Mr. Thomas Carpenter  
Designated Federal Officer  
U.S. EPA Science Advisory Board Staff Office  
Ronald Reagan Building  
1300 Pennsylvania Ave., NW, Suite 31150  
Washington, DC 20004

Dear Members of the Science Advisory Board Panel for the Great Lakes Restoration Initiative Action Plan:

I am writing on behalf of the Great Lakes Commission and its member states and provinces to provide comments for your consideration as you review the Great Lakes Restoration Initiative (GLRI) Action Plan. The Commission appreciates your service on the Science Advisory Board panel and looks forward to the results of your review. The Commission strongly supports the GLRI and believes its implementation will strengthen the environmental and economic health of the Great Lakes region.

The Commission and its member states contributed to the development and review of the Action Plan and have been actively involved in advancing implementation of the GLRI. We urge you to bear in mind the critical role the states play in restoring and managing the Great Lakes, as well as their contributions to our scientific understanding of the environmental challenges facing the lakes and the associated solutions that we are pursuing under the GLRI.

Earlier this year the Commission provided recommendations to Congress on how to strengthen implementation of the GLRI; these are attached for your reference. For purposes of your review of the GLRI Action Plan I would emphasize two recommendations in particular: 1) strengthen coordination with the states and provide greater authority in implementing the GLRI; and 2) maintain the GLRI's focus on existing priorities and on-the-ground actions.

As you know, the GLRI is supporting implementation of the *Great Lakes Regional Collaboration Strategy to Restore and Protect the Great Lakes*. This strategy was based on priorities established by the governors of the eight Great Lakes states and its content reflects contributions from more than 1,500 stakeholders from across the region. The GLRI Action Plan is intended to guide the strategy's implementation and, thus, should reflect its goals and objectives. More broadly, it should reflect and advance the many restoration plans that have been developed over the years by federal and state agencies, local governments, and nongovernmental organizations to address state and local priorities, or species- or ecosystem-specific concerns.

In particular, many of the states of have developed strategies to guide Great Lakes restoration efforts within their jurisdictions, and detailed Remedial Action Plans are in place to guide restoration of the 30 remaining U.S. and binational Areas of Concern. The Action Plan must incorporate by reference these plans and provide the necessary

flexibility to ensure the GLRI advances their priorities. In short, the Action Plan should build on these resources, rather than supplant or duplicate them.

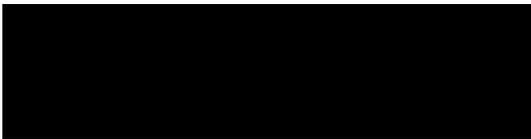
We believe the best way to accomplish this is to ensure meaningful and systematic coordination and consultation with the Great Lakes states and to provide state agencies with substantial authority to implement the GLRI. As a single document the Action Plan cannot possibly reflect the broad knowledge and detailed planning in place within the states. However, it can and must provide a process that uses this as a foundation for implementing the GLRI. It should also empower the states as equal partners with U.S. EPA and the other federal agencies.

The Commission also believes the GLRI should focus primarily on specific, on-the-ground actions that restore the physical, chemical or biological integrity of the Great Lakes. We recognize the need for monitoring, evaluation, and communication and education, but urge that such efforts be directed at effectively implementing critical restoration actions while ensuring the overall scientific credibility of the GLRI.

The Commission believes the Action Plan provides sound guidance for implementing and evaluating progress under the GLRI. While there may be room for improvement, we do not believe wholesale revisions are needed. Indeed, unless severe flaws are identified, devoting substantial efforts toward this end will only distract from the vital – and highly demanding – work currently underway to translate the Action Plan’s goals and objectives into on-the-ground actions. If the panel has concerns or identifies shortcomings in the Action Plan, we recommend they be addressed in the most efficient manner possible in consultation with the states.

We appreciate the opportunity to provide these comments and look forward to reviewing the panel’s findings and recommendations. We stand ready to assist U.S. EPA in addressing concerns identified by the panel in consultation with our member states. If you have questions, please contact me at 734-971-9135, teder@glc.org.

Sincerely,



Tim Eder  
Executive Director

Attachment

cc: Cameron Davis, Senior Advisor to the U.S. EPA Administrator for the Great Lakes  
Susan Hedman, Regional Administrator, U.S. EPA Region 5



## Great Lakes Commission Recommendations for Improving the Implementation of the Great Lakes Restoration Initiative

*Approved by the Great Lakes Commission Board of Directors  
May 2011*

### Overview

On behalf of its eight member states, the Great Lakes Commission calls on the House and Senate appropriations committees to improve the efficiency of the Great Lakes Restoration Initiative (GLRI) by directing the U.S. Environmental Protection Agency (U.S. EPA) to strengthen coordination with the states and give them greater authority over how the GLRI is implemented. The Great Lakes states are on the “front line” in implementing the GLRI and making it a success. They know what the most important restoration priorities are and can direct resources to them efficiently. It is critical that U.S. EPA and other federal agencies collaborate with the states and give them a leading role in guiding and implementing the GLRI. Toward this end, the Commission urges the House and Senate appropriations committees to include guidance on the GLRI in the reports that accompany the FY 2012 Interior-Environment appropriations bill.

### Recommended Guidance for FY 2012 Appropriations for the Great Lakes Restoration Initiative

- **Strengthen coordination with the states and provide greater authority in implementing the GLRI:** Given the critical role of the eight Great Lakes states in implementing the GLRI, it is imperative that U.S. EPA coordinate closely with the states to establish annual funding plans and manage the Initiative’s implementation. U.S. EPA needs to consult with the states to assess progress under the GLRI, identify future priorities, and refine the implementation process. U.S. EPA should provide the states with an elevated role in administering the GLRI, as well as special consideration for resources.
- **Administer GLRI funding in a way that minimizes transaction costs and maximizes efficiency and on-the ground results:** U.S. EPA should use block grants to the states or similar mechanisms to direct funding to specific priorities. The multitude of federal agencies, programs and funding mechanisms utilized to date is inefficient and imposes unnecessary administrative burdens on both federal agencies and state and local governments that are working to direct resources to site-specific restoration needs. The states strongly support the use of a block grant or “bundling” approach that enables them to manage funds efficiently, focus on the highest priorities, coordinate with local governments and other stakeholders, and accelerate the pace of restoration actions.
- **Maintain the GLRI’s focus on existing priorities and on-the-ground actions:** The GLRI should continue to focus on implementing projects that address priorities in existing plans, including the Initiative’s Action Plan, the Great Lakes Regional Collaboration restoration strategy, state-specific restoration plans, remedial action plans for Areas of Concern, Lakewide Management Plans, and related documents. GLRI funding should be devoted predominantly to site-specific restoration actions, versus monitoring, planning or management activities.
- **Minimize nonfederal match requirements:** Recognizing the severe fiscal constraints facing state and local governments and the substantial contributions they already make to Great Lakes restoration, GLRI funding should be administered through programs that do not require non-federal funding, or where this requirement can be met with in-kind services.
- **Maintain base funding for existing programs:** The GLRI is intended to supplement, but not supplant, funding for existing programs that address the Great Lakes. U.S. EPA should ensure that federal agencies do not use resources under the GLRI to reduce or divert base funding for existing programs. In addition, Great Lakes projects should not receive less consideration in national programs due to the GLRI.