



Summary and Overview of the GLRI Action Plan II (2015-19)

Draft (October 7, 2014)

On September 24, 2014, the Interagency Task Force released the final Great Lakes Restoration Initiative (GLRI) Action Plan II (2015-19) (“Plan II”). This memorandum briefly summarizes key elements of the final plan, with specific focus on changes in the final plan with specific focus on how the Plan differs from the first GLRI Action Plan (2010-14) released February 21, 2010 (“Plan I”) and the draft Plan II released on May 30 draft. CGLI provided written comments on the May 30 draft of Plan II on July 3, 2014.

Background and Overview

During FY10 through FY14, the US federal government spent more than \$1.6 billion under Great Lakes Restoration Initiative (GLRI) to fund projects and programs designed to protect and restore the Great Lakes. The Obama Administration has promised continued US federal funding during GLRI Phase II (FY15 through FY19). The first GLRI Action Plan (February 21, 2010) (“Plan I”) established long-term goals for the Great Lakes ecosystem and identified five focus areas for GLRI investments:

- Toxic substances and Areas of Concern;
- Invasive species;
- Nearshore health and nonpoint source pollution;
- Native and wildlife protection and restoration; and
- Accountability, education, monitoring, evaluation, communication and partnerships.

The second GLRI Action Plan (September 24, 2014) (“Plan II”) essentially retains these five focus areas. Plan II describes objectives and measures of progress for federal agency action during FY15-19 in four major focus areas:

- Toxic Substances and Areas of Concern;
- Preventing and controlling invasive species;
- Reducing runoff that contributes to algal blooms; and
- Restoring habitat to protect native species.

Plan II also describes significant agency commitments (described as “Foundations for Future Restoration Actions”) to conduct education and outreach on significant Great Lakes issues; incorporate a science-based adaptive management approach into GLRI implementation, and develop and incorporate climate resiliency criteria in project selection. A summary of specific objectives, commitments and measures of progress established in Plan II is attached to this memo.

General Comments and Observations

Measures of Progress: CGLI commented in July 2014 that the proposed “measures of progress” in draft Plan II counted projects or activities but did not evaluate the quality or relevance of project outcomes. We encouraged the agencies to identify measures of progress that are more outcome or performance-oriented than measures that simply count projects, acres, or miles.

In the final Plan II, the agencies clarified that measures of progress that track the longer-term ecological benefits of GLRI-funded projects are impractical because such benefits may take years to document in

an ecosystem as large and complex as the Great Lakes and the plan is expected to be implemented over a discrete period of five years (Final Plan II, p. 3). Instead, the agencies explained, the plan incorporates longer-term outcomes as an element of the adaptive management cycle. Adaptive management requires the agencies to measure progress toward long-term ecosystem goals and to establish annual priorities based in part on changes (if any) in the health of the Great Lakes ecosystem (Final Plan II, p. 29). Overall, the measures of progress in Plan II are more directly related to project activities than the measures in Plan I, many of which proposed to measure project outcomes.

The agencies likely have incorporated shorter-term, easily quantified measures of progress in order to demonstrate greater program success over the next five-year GLRI phase. According to the agencies, some of the measures of progress in Plan I were too difficult to measure, too sweeping or comprehensive, and/or not within the agencies' influence or control. Examples of measures of progress that appear to have been abandoned in Plan II include

- percentage decline in long-term average PCB fish tissue concentrations,
- acres managed to effectively control populations of invasive species to target levels,
- the number of days of beach closures due to nuisance algae; and
- the percent of native, aquatic, non-threatened and endangered species populations that are self-sustaining in the wild.

Partnerships: CGLI suggested in July 2014 that the agencies standardize the text in Plan II that refers to non-agency partnerships. While draft Plan II primarily referenced "federal agencies and their partners," the draft also referenced specific partner types (e.g., "nonfederal partners" or "state and local partners"). Final Plan II describes partner activities as those undertaken by "federal agencies and their partners," which eliminates unintended restrictions in the type of partnership that may be appropriate in various GLRI contexts.

Specific Comments and Observations

Focus Area 1: Toxic Substances and Areas of Concern: In Plan I, the agencies targeted the remediation of contaminated sediments and addressing other major pollution sources in order to restore and delist areas of concern (AOCs). During the first phase of the program, the agencies delisted five AOCs and removed 42 beneficial use impairments (BUIs) in 17 AOCs. Secondary priorities in Plan I included activities to assess and address emerging contaminants that could affect drinking water sources, such as flame retardants, surfactants, pharmaceuticals, and personal care constituents. Plan I also included support for reform of the Toxic Substances Control Act (TSCA) and a continuation of agency attempts to achieve "virtual elimination" of persistent toxic substances (PTS) from the Great Lakes ecosystem.

Plan II continues the agencies' commitment to remediate, restore, and delist AOCs. According to the plan, during FY15 to FY19 the agencies intend to fund activities necessary to delist 10 AOCs and remove 34 BUIs from the remaining 29 AOCs. These activities will include dredging contaminated sediment and restoring habitat.

Plan II also proposes to fund activities that increase knowledge about contaminants in Great Lakes fish and wildlife. The plan proposes to reduce human exposure to fish contaminants through targeted outreach to high-risk fish consuming populations (such as children, pregnant women, urban anglers, and tribal communities). The plan also proposes to fund research designed to identify emerging contaminants and assess their impacts on Great Lakes fish and wildlife. By contrast to Plan I, Plan II does not include pollution prevention and waste minimization goals or seek to measure a decline in the PCB fish tissue concentrations. Plan II does not mention the virtual elimination of PTS or TSCA reform.

Final Plan II incorporates several changes from draft Plan II that CGLI suggested in July 2014. Notably, a problematic figure in the draft plan has been eliminated. CGLI argued that the figure was unhelpful and potentially may be misleading because it depicted the number of chemicals that had been detected in Great Lakes tributaries but said nothing about the levels of substances detected, the source of the substances, or the potential significance of the findings when compared with acceptable substance concentrations. The chart was replaced with an illustration that depicts pathways by which contamination can reach the lakes (including, among others, “runoff and discharge” from urban areas).

Focus Area 2: Invasive Species: Plan I established aggressive long term goals for the prevention and control of invasive species. The plan declared a “zero tolerance policy” toward the introduction of new invasive species and established a long-term goal of preventing the spread of existing invasives beyond their then-existing range. Measures of progress under Plan I included ten new ballast water control technologies; adoption of aquatic nuisance species management and rapid response plans in all eight Great Lakes states; and a 40% reduction in the yearly average rate of newly-detected invasive species in the Great Lakes ecosystem.

Like Plan I, Plan II focuses on programs and practices designed to prevent the introduction of new invasive species and to control existing invasive species populations. However, by contrast to Plan I, Plan II focuses on invasive species pathways, not populations or technologies. In addition, Plan II enhances federal efforts to work with states to conduct rapid response actions and exercises.

The objectives, commitments, and measures of progress related to invasive species in final Plan II are not significantly different than they were in the May 30 draft. We note in particular that one of CGLI’s July 2014 comments was not incorporated into the final version of Plan II. In our comments, we acknowledged the importance of preventing new introductions of invasive species into the Great Lakes, but noted that effective preventive techniques often focus on risk reduction, not risk elimination. This comment is consistent with positions CGLI has taken in other invasive species discussions (e.g., as a member of the Great Lakes Panel on Aquatic Nuisance Species and the Chicago Area Waterway System Advisory Committee). In the final Plan II, agencies retained as objectives efforts to block invasive species pathways and prevent new invasive species introductions. We continue to question whether invasive species management actions can achieve risk elimination.

Focus Area 3: Nonpoint Source Pollution Impacts on Nearshore Health

Plan I included actions for addressing a wide variety of nonpoint source stressors, such as bacterial contamination, shoreline erosion, and coastal degradation. Thus, measures of progress in Plan I included the number of days of beach closure and the percentage of beaches meeting bacteria standards 95% of the time. Plan I also included measures of progress related to reductions in phosphorus loadings to the targeted watershed and the extent (in square miles) of Great Lakes harmful algal blooms.

Plan II commits to continuing investment in programs and projects that are designed to reduce nonpoint source pollution that contributes to harmful algal blooms and eutrophication. However, Plan II addresses a narrower variety of nonpoint source stressors and proposes a narrower geographic focus. Specifically, measures of progress in Plan II are phrased primarily in terms of (1) projected phosphorus reductions in target watersheds (specifically, Maumee River, Saginaw Bay, and Lower Fox River/Green Bay); and (2) the volume of untreated runoff from urban areas that is captured or treated.

Final Plan II contains more changes to this focus area compared to the May 30 draft than any other focus area. Instead of “nutrient and sediment reductions from GLRI-funded projects in target watersheds,” final Plan II proposes to measure “projected phosphorus reductions.” In addition, final Plan II adds drinking water protection as a new objective for reducing nutrient runoff in targeted watersheds, possibly in response to the City of Toledo drinking water advisory. Finally, final Plan II adds “longevity” to

the list of priorities that will guide future nutrient reduction work. Thus, when evaluating progress under this focus area, the agencies now intend to consider the “type, location, and longevity of future work,” not just the type and location of future work. This change from the May 30 draft likely acknowledges concern expressed by Great Lakes stakeholders that federal agricultural conservation incentives often are tied to conservation practices that stay in place only for short time periods.

Focus Area 4: Habitat and Species

The Habitat and Wildlife Protection and Restoration focus area in Plan I proposed significant activities designed to improve or restore species habitat. Most of the activities were targeted to wetland and coastal restoration, but some of the proposed activities were designed to assist in the recovery of target or priority species. For the past few years, the agencies have not prioritized activities in this focus area. This may be due to a decrease in initial GLRI appropriations from \$475M in FY10 to \$300M in FY11 through FY14.

Final Plan II is essentially the same as the draft. Like Plan I, Plan II includes objectives and goals for protecting, restoring, and enhancing habitat to help sustain healthy native species populations. By contrast to Plan I, however, Plan II incorporates fewer and much more specific commitments and measures of progress. Both plans seek to measure progress in terms of the number of reopened miles of Great Lakes tributaries and acreage that is protected or restored for species habitat, but Plan II no longer seeks to measure progress in terms of positive impact to protected species.

Foundations for Future Restoration Action

The fifth action plan category is perhaps the most undefined of all the GLRI focus areas. Rather than describe a substantive area of focus, this category describes activities that the agencies apparently believe are necessary for successful GLRI program implementation. In Plan I, this fifth category was considered a fifth focus area and was entitled “Accountability, Education, Monitoring, Evaluation, Communication, and Partnerships.” Pursuant to this category, the agencies established the Great Lakes Accountability System (GLAS) to track GLRI investments and invested in Lakewide Management Plan projects identified by that were completed with GLRI funds, the number of educational institutions that incorporated new or existing Great Lakes protection and stewardship criteria into their curricula, and improvement in the overall health of the Great Lakes ecosystem using a 40-point scale established under the Government Performance and Results Act.

Like Plan I, Plan II continues the agencies’ commitment to education and outreach on Great Lakes issues, including through “place-based experiential learning activities.” Under Plan II, however, the agencies must develop standardized climate resiliency criteria for application to project design and selection. The purpose of the climate criteria is to ensure that GLRI project teams consider the effect of climate change on project outcomes. Moreover, as noted previously, Plan II commits the agencies to a “science-based adaptive management approach to GLRI” that includes evaluating investment decisions to assess their effectiveness in achieving long-term goals for the Great Lakes ecosystem. However, unlike Plan I, Plan II does not include metrics of progress related to the overall health of the ecosystem. Metrics of progress under Plan II relate to the number of educators and other people who receive information about Great Lakes issues and the effectiveness of the adaptive management process.