



July 3, 2014

By email to actionplan@glngo.net

Cameron Davis

Senior Advisor to USEPA Administrator Gina McCarthy

Great Lakes National Program Office

77 West Jackson Boulevard

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Re: *Comments of the Council of Great Lakes Industries on the draft Great Lakes Restoration Initiative Action Plan II (2015-19)*

Dear Mr. Davis:

The Council of Great Lakes Industries (CGLI) offers the following comments regarding the Great Lakes Restoration Initiative Action Plan II (2015-19) for your consideration.

General Comments

1. The draft Action Plan II does a good job of describing *what* the agencies intend to accomplish but it is very lean on *how* the agencies intend to satisfy these commitments. What *actions* (i.e., programs and projects) will the agencies take? Expanding the plan to include a general description of the actions that the agencies will pursue in order to accomplish the overall program goals and commitments in each focus area would greatly improve the plan.
2. Much of the draft Action Plan II summarizes activities undertaken or completed during Action Plan I (2010-2014). When the initiatives and commitments in Action Plan II continue or build on previous activities, it makes sense to describe the previous actions for background and context. However, in some circumstances describing previous activities in detail seems unnecessary, especially when the Action Plan II seems intended to provide a simple path forward for the next phase of GLRI. The agencies might streamline the document by using a different vehicle (such as www.glri.us and other updates the agencies distribute) to provide program updates and outcomes, and to use Action Plan II as a fairly detailed road map for future activities.
3. The Plan would be more complete if it described, at least generally, how the commitments expressed might translate into GLRI projects and program changes. Unlike the previous action plan, the new plan does not include criteria or principles that would guide the selection of programs and projects. What general types of projects and programs will be funded by GLRI to achieve the commitments expressed? Will the criteria and principles set out in the previous plan remain the same during the implementation of Action Plan II?

4. It would be helpful (and provide more substance to readers and users of the Plan) if the Plan established high-level priorities for focus area activities (where appropriate). For example, the Plan might describe how the agencies intend to prioritize AOC remediation and restoration activities. Will particular AOCs be targeted for funding? Similarly, the Plan might describe particular pathways that will be targeted for invasive species prevention projects, or generally describe areas proposed for habitat restoration.
5. We recommend that the agencies standardize (where appropriate) text that refers to partnerships to avoid confusion and unintended inconsistency. Most partnerships in the current draft reference “federal agencies and their partners,” but in some parts of the Plan partnership is described in other ways (e.g., “nonfederal partners” (p. 2); “state and local partners (p. 6-7, 11, 13)). It is not clear whether these differences are intended to establish meaningful program distinctions. We also recommend that “nonfederal partners” specifically include stakeholder organizations.
6. Most of the measures of progress in Action Plan II include metrics that count projects or activities but do not evaluate the quality or relevance of the information that comes from funded projects and activities. We recognize that the agencies prefer measures of progress within the agencies’ control, but we encourage more effort to identify measures of progress that are outcome or performance oriented.

Specific Comments

Focus Area 1: Areas of Concern

1. The table at the top of page 7 (identifying measures of progress with annual targets for delisting AOCs and removing BUIs) could be clearer and seems to contradict the narrative on page 6. The plan calls for completion of all management actions required to delist eleven AOCs. In the table, the cumulative delisting target for 2015 to 2019 is 17. If the numbers are cumulative, the total of 17 should include the 3 “baseline” AOCs, but that would mean that 14 AOCs (not 11 AOCs) are expected to be delisted by 2019. Is this correct?
2. The 2015 targets shown in page 7 for both measures of progress seem much higher than those expected in the following years. It would be helpful if the plan were to provide a rationale for this higher expectation of outcomes in 2015 than in the following years.
3. On page 8, the plan states that “federal agencies will continue to work together and with partners to further evaluate emerging contaminants that have the greatest potential to adversely impact Great Lakes fish and wildlife.” Who are the “partners” that the agencies plan to work with? To what extent will industry personnel be invited to participate in this work? Stakeholder collaboration is essential to assure beneficial outcomes from these investigations.
4. On page 9 the list of “Potential Impacts of Emerging Contaminants on Great Lakes Fish and Wildlife” along with the chart of “Emerging Contaminants Detected in the Great Lakes,” left unexplained, can lead the reader to conclude that the contaminants in the chart, regardless of concentration, combination with other chemicals, or environmental conditions, can be responsible for the impacts indicated in the list and that such impacts

have actually occurred. This information needs to be clearer and more substantive if included in the final action plan. The list of potential impacts, by itself, is not sufficient to support the selection or implementation of actions to manage emerging contaminants.

5. The bar graph on page 9 is unhelpful and potentially may be misleading. The chart depicts the *number* of various chemicals that have been detected in Great Lakes tributaries, but it says nothing about the levels of substances detected, the source of the materials, or the potential significance of these findings when compared with acceptable concentrations for each substance. A much more complete picture of "emerging chemicals" in the Great Lakes is necessary to evaluate and understand any risks associated with the measure the presence of these materials. The chart also lacks an identified source or reference, which detracts from the credibility of the Plan.

Focus Area II: Invasive Species

1. While we acknowledge the importance of preventing new introductions of invasive species into the Great Lakes, effective preventive techniques may focus on risk reduction, not risk elimination. However, the Plan appears to contemplate only three techniques (blocking pathways, early detection, and rapid response). What if a pathway cannot be physically blocked, but can be managed to significantly reduce the risk of AIS transfer? Including only the three commitments identified for prevention might be overly limiting.
2. Page 13 of the Plan proposes to evaluate invasive species control projects on an annual basis, but some species might establish self-sustaining populations in shorter time periods. Rather than incorporate a fixed evaluation period, perhaps different timelines are required for different species, as some might be more aggressive than others.
3. The third principal initiative (“[d]evelop invasive species control technologies...” (p. 14)) seems overly limiting. The Plan probably should support the development of both control technologies and prevention techniques in this initiative. Expanding the initiative to include both control and prevention technologies would be more consistent with the first commitment toward this initiative, which reads “Develop/enhance technologies and methods to prevent the introduction and to control the spread of invasive species.”

Focus Area III: Nonpoint Source Pollution and Nearshore Health

1. Focus Area III seems to be missing a potentially critical initiative: assessing the connection between various sources of nutrient runoff, harmful algal blooms, in-lake mixing, climate change and invasive species. The two existing principal initiatives focus solely on reducing nutrient loads in agricultural and urban waterways, with only a secondary mention of work designed to study, monitor, or develop cross-sector partnerships for reducing adverse impacts to nearshore health. We suggest a third principal initiative for Focus Area III (“Enhance knowledge, understanding, and collaboration to reduce the impact of nutrients on Great Lakes watersheds” or something similar), with measures of progress (e.g., “number of nutrient reduction partnerships developed/enhanced with GLRI funding”).

Focus Area IV: Habitat and Species

1. Focus Area II identifies certain invasive species as “targets” under GLRI Action Plan II (p. 12) and even calls out three species (phragmites, monocious Hydrilla, and grass carp) for species-specific collaboration (p. 15). By contrast, Focus Area IV appears to target all native species, with special focus only on fish. Are all native species critical to the health of the Great Lakes? Are there particular species that should be targeted because they are more critical to the health of the Great Lakes ecosystem?

Focus Area V: Integrated Solutions to Cross-Cutting Issues

1. There seems to be a mismatch between the time scales of projects funded under GLRI (reviewed annually and at the end of the five-year GLRI Phase II), and the time scale typically associated with predicted climate impact. As the agencies develop climate resiliency criteria, more guidance on how these time scales align (or can be reconciled) may be necessary.
2. The Action Plan II should incorporate specific initiatives to encourage collaboration across multiple scales. While localized action is critically important to restoration activities, at some point a broader watershed or lakewide focus is essential so that a greater community of stakeholders can work toward loftier goals. Another principal initiative of Focus Area V might be to promote cross-sector collaboration at the project level and at greater scales, because collaboration is an essential “integrated solution to cross-cutting problems” facing the Great Lakes ecosystem.

CGLI appreciates the opportunity to provide input to the GLRI Action Plan II (2015-19). Please contact me, Dale K. Phenicie (dkphenicie@cgli.org), or Ana Sirviente, PhD (asirv@cgli.org) if you have any questions about these comments or need additional information not provided in this letter.

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CGLI is a binational non-profit organization representing the common policy interests of Canadian and US industrial organizations from the manufacturing, utilities, transportation, natural resources, and trade sectors that have investments in the Great Lakes region. The mission of CGLI is to promote the growth and vitality of the region in harmony with its human and natural resources (sustainable development).

Very truly yours,

COUNCIL OF GREAT LAKES INDUSTRIES



Kathryn A. Buckner, President