



May 24, 2024

The Honorable Debra Shore
Great Lakes National Program Manager
U.S. Environmental Protection Agency
77 W. Jackson Boulevard, Suite 1900
Chicago, IL 60604

Re: Great Lakes Coalition Comments on Draft Great Lakes Restoration Initiative Action Plan

Dear Ms. Shore:

We write to you in your capacity as Great Lakes National Program Manager to send our thanks to you, your staff, and Great Lakes Regional Working Group agencies for the Great Lakes Restoration Initiative's draft Action Plan IV, released last month.

In an August 31, 2023, letter to Administrator Regan, the Coalition asked that the next Action Plan: (1) accelerate progress on Great Lakes restoration and protection; (2) prioritize restoration for places facing the greatest threats and harms, including historically underserved communities; and (3) support climate friendly projects like wetland restoration, stormwater reduction from agricultural lands, and similar projects. The Coalition also provided specific recommendations for updating the plan.

The draft Action Plan released for public comment in April adopted most of our recommendations in whole or in part. In general, the draft Action Plan:

- Articulates a stronger link between ecological health and benefits to people, especially those in underserved communities.
- Expands long-term goals to include an emphasis on climate-oriented resilience, community and economic revitalization, and equitable access to restoration benefits.
- Adds operating principles to guide planning and implementation that, if followed, ensure work under the focus areas remains integrated and outcome oriented with meaningful community engagement.

More specifically, we are supportive of the changes that:

- Facilitate more diverse and sustained public engagement, so that benefits are available where they are needed most, such as around Areas of Concern communities.
- Focus on threats and opportunities within historically underserved communities, such as reduced flooding induced by climate change.
- Harness the most recent scientific understanding to better prevent new, and manage existing, invasive species-related risks, including from lake-to-lake transfers.
- Continue to recognize that support for collaboration and community-based efforts is one of the best ways to ensure strong restoration and accountability.
- Recognize the importance of environmental workforce development programs as a part of GLRI, with a focus on underserved communities.

These are clear improvements to the Action Plan and we look forward to sharing our views on improvements for programmatic implementation later this year. In the meantime, there are still two areas in the draft Action Plan we believe need more attention: supporting collaborative efforts to achieve agricultural instream water quality improvements and strengthening coastal resilience. We have provided proposed language in the attachment to this letter but describe the problems and solutions to them below.

Focus Area 3: Support Collaborative Efforts to Achieve Agricultural Instream Water Quality Improvements

Problem: Neither agencies nor the public are seeing sufficient “bang for the buck” in reducing toxic algal blooms (TABs). This problem results from at least two factors: (A) downstream urban and upstream rural communities are often disconnected (e.g., insufficient social infrastructure), and (B) success has historically been based on upland conservation practices when instream water quality is the real measure of whether TABs will occur downstream.

Proposed Solution: (A) The Action Plan must place the same emphasis on investments in social infrastructure in Focus Area 3 as it does in Focus Area 2. We propose to take similar language already used in the draft Action Plan for collaborative invasive species management and replicate it in Focus Area 3 to manage nonpoint pollution. Additionally, (B) we urge the agencies to measure success based on instream water quality, not just upland conservation practices.

Advantages: The agencies have traditionally shied away from instream water quality measures because they do not have the regulatory authority to enforce them. However, instream water quality measures can be developed voluntarily by upstream and downstream community collaborations, and the GLRI can be a vehicle to overcome historic barriers.

Strengthening Coastal Resilience

Problem: Our coasts are among the most biologically productive zones in the Great Lakes yet, according to the National Oceanic and Atmospheric Administration, they are also among the most heavily stressed areas because of pollution, erosion, human activity, and other threats. While the draft Action Plan recognizes coastlines, it does not do so at a level commensurate with their ecological importance or in a way that provides for clear, measurable progress.

Proposed Solution: We have provided two options in the attached recommendations.

Our first, preferred recommendation is to add a new Measure of Progress 4.1.3. with the “[proposed number] of miles acquired or converted from hard engineering to using nature-based shoreline solutions.” This is a simple way to address this imperative.

An alternative, however, would be to add a new Objective 3.4. to “support natural coastal approaches” with a new Measure of Progress 3.4.1., using the same language proposed for 4.1.3. above.

Advantages: This language directs GLRI investments toward our coasts that require special protection and accelerated restoration efforts. These are not just coastal wetlands, river mouths, or recreational beaches. These also include bluffs, freshwater sand dunes, underwater nearshore ravines, and other areas subjected to ecological stress and intense human pressure.

In closing, we appreciate the strides the draft makes in addressing public needs from last year’s engagement sessions. We look forward to working with you to strengthen the GLRI program and the Action Plan, and to make sure it addresses the needs of everyone in the region.

Sincerely,

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