



August 8, 2011

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Senior Advisor to the Administrator
Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604

Susan Hedman
Regional Administrator, Region V
Environmental Protection Agency
77 West Jackson Boulevard
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Dear Mr. Davis and Ms. Hedman:

The Healing Our Waters-Great Lakes (HOW) Coalition and its 117 member organizations appreciated the opportunity to provide comments on Great Lakes restoration priority issues, needs, efforts, and activities for fiscal years 2012 and 2013 and general comments about the Great Lakes Restoration Initiative (GLRI) on the webinar that EPA hosted for Great Lakes stakeholders on May 10, 2011. The following includes points that were conveyed on that call and substantive comments received from HOW Coalition members who have received GLRI grants. These comments provide feedback and offer suggestions to make the implementation of Great Lakes Restoration Initiative grants as effective and efficient as possible for current and future grants under the program. We would like to arrange a meeting with you to further discuss these comments and answer any questions regarding the experiences HOW Coalition members have had applying for GLRI grants.

In order to continue to make progress and see results from the crucial restoration work being done through the GLRI, EPA must budget an additional \$475 million for the GLRI in its fiscal year 2013 budget. We cannot afford not to protect the Great Lakes, the source of drinking water for 30 million people. In community after community, Great Lakes restoration activities are creating jobs, protecting public health, and upholding a way of life. However, there is much more work to do. As evidence of this, the amount of applications for GLRI funding in 2011 exceeded the amount of funds available three-to-one.

Restoration projects are producing results. In Ashtabula, Ohio, a \$60 million cleanup of the Ashtabula River resulted in the removal of 630,000 cubic yards of contaminated sediment that contained more than 25,000 pounds of hazardous PCBs and other toxic compounds. The cleanup improved water quality and deepened the river channel for maritime commerce, fishing, and recreational boating. In Milwaukee, Wisconsin, state and federal agencies completed a \$22 million clean-up project that resulted in the removal of 167,000 cubic yards of toxic mud from the Kinnickinnic River, which flows into Lake Michigan. The cleanup restored navigation to the river that had been long avoided and attracted new businesses, including a new office complex and additional docks to marinas. In Saginaw Bay, Michigan, a \$3.1 million wetlands restoration project restored more than 900 acres of wetlands in Tobico Marsh and permanently protected roughly 25,000 acres of wetlands. It is estimated that recreational activities, such as hunting, fishing, and birding, will generate \$239 million over a 30-year period.

Great Lakes restoration is one of the best returns on the federal dollar in the budget. While pressure to balance the U.S. budget will not diminish, neither will the problems facing the Great Lakes. If funding is cut now, it will only cost more later because these projects will only get harder and more expensive the longer we wait.

Although the bulk of Federal GLRI investments should continue to be focused on the highest priority on-the-ground, in-the-water activities that produce the greatest measurable restoration results, some funding

should be set aside for basic science, research, and monitoring. Investments in these areas are important because they tell us how to adapt plans. They make sure we are continuing to prioritize the most needed projects and are using the most effective implementation methods. Because research and on-the-ground work go hand in hand, it is important that both receive resources. It is also important that funding for grants goes to colleges, universities, and other groups that are also doing important research and does not just stay at Federal agencies.

Additionally, a portion of these research and monitoring funds should be directed toward the operation, maintenance and monitoring of completed GLRI projects. Completed on-the-ground and in-the-water projects often require ongoing operation and maintenance work, and monitoring, an important component of that work, is critical to track the beneficial impacts of projects. It is important that applicable GLRI awards have some way to operate, maintain and monitor a project. Because local organizations do not have the resources to continue this work on their own without additional support, this could include a small amount of funding within the grant set aside for operation and maintenance or the option for GLRI grantees to apply for a small operation, maintenance or monitoring grant once a GLRI project is successfully implemented.

Next, in order to promote healthy systems throughout the Great Lakes, we also urge EPA to apply a watershed approach to on-the-ground, in-the-water restoration work. Projects close to shorelines are important in improving the health of the lakes, but many problems start further upstream – whether from pollution, invasive species, or habitat destruction – and need to be addressed and remediated to achieve broader ecosystem health. Strategically funding projects that will promote holistic watershed health will not only make projects downstream and in the lakes easier but will help to maintain restored systems and prevent reoccurring damage.

In particular, EPA can promote watershed restoration by putting forward a more flexible Request for Proposals that encourages collaboration and partnerships and sets geographic priorities. Restoring ecosystem health often requires an integrated approach – tackling a suite of stressors in a variety of locations through collaborative and integrated action. Currently, the GLRI applications process has made it challenging for groups to work together by categorizing restoration activities by size, cost, geography, and issue area, which has had the net effect, in some cases, of fragmenting restoration activities. EPA can accelerate restoration efforts in a more efficient and effective manner by updating GLRI application and evaluation criteria to encourage holistic restoration on the watershed-level. By setting geographic restoration priority areas and facilitating collaboration among groups within the same geographic focus area, EPA and other Federal agencies can support a suite of restoration activities whose benefit is greater than the sum of its parts – rather than a piecemeal approach in which results may be harder to evaluate.

To address the need for geographical priority areas, the HOW Coalition's Technical Advisory Committee examined the critical issues faced across the region, many of which mirror those addressed by the GLRI. The TAC, along with the Coalition's Implementation Working Group, identified five primary areas to focus the Coalition's limited implementation funding program: St. Louis Bay, Chicagoland, Saginaw Bay, Western Lake Erie, and Eastern Lake Ontario. These priority areas suffer from some of the biggest and most acute problems across the Great Lakes Basin, but show high potential for improving conditions, promoting tourism, and creating jobs. This designation allows the HOW granting program to more easily coordinate our support for restoration efforts and encourage collaboration among organizations with projects in these areas.

A comprehensive, watershed approach looks at all parts of a system, including biological inputs. In an area like the Great Lakes region, which is plagued by aging infrastructure, it means sewer systems that

overflow. Past GLRI funding has appropriately precluded funding for sewer or combined sewer infrastructure improvements as part of a larger restoration project. However, when included as components within a restoration project that complement existing or planned infrastructure work, green infrastructure improvements associated with larger infrastructure projects could be given consideration in future funding rounds and should not trigger barriers to funding. These types of improvements are an important piece to reaching restoration goals because they contribute to better water quality, compliment restoration efforts throughout the watershed and basin, and coordinate activities between programs. However, GLRI funding should continue to only supplement and not supplant the funding available for infrastructure work supported by the Clean Water or Drinking Water State Revolving Funds. Additionally, moving forward, coordination among all projects and all agencies – even non-GLRI programs like the SRFs or other Clean Water Act requirements – will be critical to avoid duplicating efforts and unintentionally undermining projects.

HOW Coalition member organizations who received GLRI awards praised the streamlined GLRI financial reimbursement and reporting system put in place by EPA. However, serious concerns were raised about the Quality Assurance Protocols (QAPs) required for awards. First and foremost, groups are frustrated with the overly burdensome nature of preparing, revising, and receiving approval for a project QAP, which is taking weeks to months. The revision and approval process is causing groups to spend excessive amounts of staff time and resources on reiterations of QAPs for each project and is causing project start dates to be delayed. While it is important to be able to measure progress and maintain accountability, QAPs should not become an obstacle to the vital on-the-ground restoration work needed to restore the Great Lakes.

Instead, EPA should re-evaluate their Quality Assurance Protocols to ensure that all requirements are project-appropriate. In many cases, including habitat and wetland restoration work, the QAP formula is a poor fit for measuring the quality of on-the-ground and in-the-water work that the GLRI emphasizes. We urge EPA to adopt the successful models used by the National Oceanic and Atmospheric Administration (NOAA) or the U.S. Fish and Wildlife Service (FWS) for measuring quality assurance of habitat and wetland restoration projects. These models are not overly burdensome to the grantee, allow work to continue within the approved project timeline, and incorporate widely accepted protocols readily available for these types of projects, including use of best practices and engineering protocols.

The transfer of habitat-related project management from EPA to NOAA, FWS, and the Sustain Our Great Lakes Program for the 2011 Request for Applications has benefited from the experience of these agencies with habitat-related projects; we urge EPA to continue to authorize the appropriate agencies to award GLRI funds and increase the amount of funds available for these projects. Distributing funding awards and decisions across agencies not only allows the agencies with the most experience in an area to provide expertise to grantees, but also lessens the burden of managing a large amount of grants by EPA. However, EPA must be vigilant that agencies do not use GLRI funding as part of their base budgets, as Congress instructed the GLRI to be supplementary, not to replace base funding. EPA must also work to reduce the amount of GLRI funding being withheld by agencies for agency activities and instead focus on ensuring most GLRI funds are passing through as grants, contracts, etc., to non-federal sponsors for restoration activities. This will continue the trend from EPA and other federal agencies of funding the best and most needed restoration projects throughout the region and help all agencies to provide the best assistance to project grantees.

The Great Lakes Region, while united across a common resource, is divided among EPA Region Two, Region Three, and Region Five. This has caused logistical issues for grant recipients in Region Two who attended trainings in Region 5 or received general information intended for all GLRI awardees, only to find out that the QAP requirements and/or reporting process were different in Region 2. These

inconsistencies create delays in project implementation and must be solved. Better communication and coordination between EPA's Region Two and Region Five should be a top priority and a simple fix to ensure that GLRI grantees are being given consistent information and requirements regardless of the EPA jurisdiction their project falls within.

Finally, the process of acquiring permits from various federal and state agencies for GLRI projects has resulted in project delays and additional work by grantees. Permitting requirements should be made as clear as possible up front to allow groups to collect the data and information needed to avoid permitting delays and to allow groups to adequately prepare for the work needed to acquire the necessary permits. In addition, EPA should help to ease the burden of the federal permitting process by providing extra staff or funding to permitting agencies in preparation of GLRI project permitting cycles. Project delays are being exacerbated as permitting agencies receive an onslaught of applications because of GLRI funds. Providing the resources and staff time needed to move forward restoration projects that will produce results and bring us closer to our restoration goals for the Great Lakes is essential and needed.

Thank you for the opportunity to provide comments on Great Lakes restoration funding and the GLRI. EPA and the Obama Administration have done a tremendous job leading the effort to restore the Great Lakes, the source of more than 90 percent of the nation's surface fresh water. We encourage EPA to take these comments to heart to make a good program even better. If you have any questions, please contact Chad Lord, Policy Director of the Healing Our Waters-Great Lakes Coalition, at (202) 454-3385 or clord@npca.org.

Sincerely,



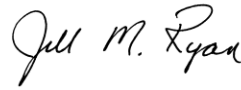
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