



Recommendations of the Great Lakes Commission to
U.S. EPA on Improving the Efficiency of the
Great Lakes Restoration Initiative

*Approved by the Great Lakes Commission Board of Directors
July 2012*

- **Sustain effective and consistent coordination and consultation with the states:** The states have strong local knowledge that should be utilized both in guiding the overall structure of the GLRI program as well as the individual projects that will best advance restoration goals. State implementation strategies for the Areas of Concern (AOC) are particularly important and should be followed wherever possible. U.S. EPA should consult regularly with the states on programmatic priorities, and, where possible, provide a state role in reviewing and advising on the selection of restoration projects. This will direct funds to the strongest projects and avoid funding those that are inconsistent with state priorities. In brief, allow the states to help make the GLRI an even greater success.
- **Maintain noncompetitive funding to support state engagement in carrying out the GLRI:** This is vital to building and sustaining strong state capacity to engage in the GLRI and help make it a success. The states appreciate U.S. EPA's support and recognition for their unique role. This approach should be sustained and, where appropriate, communicated with regional stakeholders to showcase the GLRI as a partnership between the federal government and the eight Great Lakes states, together with local communities and nongovernmental groups.
- **Use a block-grant or broad workplan approach to improve the states' ability to advance large-scale, multi-year restoration projects while minimizing administrative costs for multiple grants:** GLRI requests for proposals are often for small, multiple, project-specific grants. These are not an efficient approach for states advancing broad-based restoration programs. Supporting a broader workplan and increasing the funding ceiling for state grants would enable a more holistic approach and minimize transaction costs.
- **Improve the coordination, consolidation, predictability and consistency of requests for proposals (RFPs) among federal agencies administering GLRI funding:** RFPs are released from different federal agencies with varying schedules, deadlines, and priorities. It is difficult to track, plan for, and respond to such a variety of funding opportunities. Their priorities sometimes change from one year to another causing further confusion and uncertainty. Consolidating multiple funding opportunities and providing greater clarity and consistency on their priorities and schedule will reduce confusion and facilitate a more rational planning process.
- **Streamline and accelerate the review and award of restoration grants to facilitate more timely project implementation:** Delays in finalizing grant arrangements are slowing the implementation process, particularly when this depends on a sampling, growing or construction season. The overall schedule should ensure that projects can begin at the appropriate time. More time is needed to submit proposals after release of RFPs. State bureaucracies often require approval to submit proposals and substantial internal coordination among agency divisions and with outside stakeholders.
- **Streamline the process for reviewing and approving Quality Assurance Project Plans (QAPPs) and avoid this requirement when not necessary:** The requirement for QAPPs and the process for developing, reviewing and approving them is unnecessarily complicated and cumbersome and has resulted in significant delays that have prevented the timely start of restoration projects (which slows the spending rate of GLRI funds, among other impacts). The quality assurance requirements for U.S.

EPA-funded grants are more onerous than those for other federal agencies. QAPPs should not be required unless necessary to ensure the success of the project and the states should be allowed to use established agency quality assurance plans for their GLRI projects. An inordinate level of effort is being devoted to QAPP requirements resulting in significant frustration among state and local grantees.

- **Improve the Great Lakes Accountability System (GLAS):** As currently structured, GLAS is of limited use and does not provide meaningful information to the public and other users. It tracks only a single performance measure and thus does not reflect the full impact of restoration projects. The system should be updated to address recommendations from the Science Advisory Board to be more than an accounting system and to provide a mechanism to improve transparency, track both outcomes and outputs, and facilitate programmatic evaluation and improvement as the GLRI moves forward. The system can be improved to be more user-friendly and provide more meaningful outputs.
- **Recognize the states' constraints in spending GLRI funds:** States may be slow in spending GLRI funding due to contracting issues (e.g., payment upon completion of services) and related administrative requirements (in addition to delays in finalizing grant agreements with federal agencies or gaining approval of QAPPs). States should not be penalized in future grant reviews due to this unavoidable situation.
- **Balance the focus on near-term priorities with continued support for long-term restoration projects:** The states understand the importance of achieving progress in the near term and directing resources toward this end, including AOCs that can be delisted soon. However, funding should also be provided for more complex AOCs and other long-term restoration needs to maintain momentum and stakeholder engagement, and to lay a foundation for progress in future years.
- **Minimize nonfederal match requirements and allow flexibility for in-kind support and other innovative approaches:** This is particularly important for Great Lakes Legacy Act projects, recognizing the substantial nonfederal costs and the fiscal constraints among the states.
- **Priority Watersheds:** Target as the highest priority for project funding watersheds – including at least one watershed in each lake basin – shown to be contributing a significant loading of nutrients, priority toxic chemicals and/or pathogens and thereby impacting nearshore health. Grants should not be limited solely to watershed plans with the nine elements required for Section 319 nonpoint source grants.
- **Improve the transparency and communication of how GLRI funds are being spent:** Be clear and transparent about how GLRI funds are being allocated and remain consistent in communicating this to the states, regional stakeholders and Congress. With less funding administered through a large competitive RFP, it remains unclear how the substantial remaining funds are being allocated. The overall reporting on GLRI funding allocation has been inadequate and is difficult to follow even for those closely following the Initiative's implementation.
- **Improve the transparency and coordination of federal monitoring activities:** Improve communication with state agencies about GLRI-funded monitoring and research being conducted by federal agencies and ensure this is coordinated with and supports state efforts and restoration priorities.
- **Support public education and outreach:** This will be particularly important in AOCs that will be delisted in coming years to ensure the public understands both the progress achieved and the limitations of the AOC process (and the associated need for continued environmental improvements). Where possible, local nonprofit groups should be supported to communicate to their communities about the purpose and value of Great Lakes restoration activities, the role of citizens, and the progress being made.