Question 4A: Should GLRI invest only in projects that leverage non-GLRI money?

GLAB believes that the agencies should encourage, and when appropriate prioritize, projects that leverage non-GLRI resources. The urgent need for restoration and protection of the Great Lakes far exceeds even the generous funding provided under the GLRI. To maximize the impact of the GLRI program, the agencies must select projects that promise the greatest ecosystem improvement. In addition, the agencies should generate incremental benefit whenever possible through state, local, and private investment. Prioritizing projects that leverage non-GLRI resources is consistent with the characterization of the GLRI program as an "accelerator" of projects that non-federal agencies and private organizations have targeted as priorities.

Leveraging non-GLRI resources also may generate other program benefits. Project teams that contribute non-GLRI resources may have a greater sense of project "ownership" than teams that do not share project costs. Communities and organizations required to contribute non-GLRI resources also may have to engage a wider variety of stakeholders in establishing priorities and in project design, which could result in greater "buy in" and participation from impacted communities. Finally, project teams that supplement GLRI funds may be more likely to create partnerships that improve project effectiveness, establish mechanisms for sharing outcomes, and create or enhance a sense of community.

Agencies must accept in-kind contributions when determining the extent to which a project leverages non-GLRI resources. Both financial and non-financial resources contribute to the successful completion of GLRI project work. Agencies must be permit applicants to leverage GLRI funds by providing non-financial resources, such as staff and volunteer time, technical expertise, equipment and materials, office or meeting space, and similar contributions.

However, projects unable to provide "match" funds should <u>not</u> be ineligible for GLRI funding except as required by law. Some problems in the Great Lakes region cannot be traced to any particular person, or can only be traced to a person that no longer is viable. "Matching" GLRI investments often is difficult or impossible in such cases because no non-GLRI funding source is available. Likewise, small organizations, such as local watershed groups, might be unable to generate "match" funds for otherwise worthy projects. Requiring "match" funds as an eligibility requirement potentially would disqualify projects proposed by applicants that simply do not have access to other funding sources. Conversely, requiring a "match" as an eligibility requirement might create an advantage for well-resourced applicants (such as universities and state governments).

Question 4B: Should we do only larger, landscape scale projects (e.g., \$3 million to \$10 million)?

Flexibility in project selection is important. The primary consideration in GLRI program implementation should be to make GLRI investments that have the greatest potential for achieving measurable improvements to the Great Lakes ecosystem. The focus should be on projects that lead to large-scale *impact*, not any particular dollar value. Such projects may have whole-lake or multi-lake impacts, but also might creat or contribute to significant impact by addressing multiple stressors in smaller geographic regions or generating data, models, or other project outcomes that are applicable to multiple projects.

GLAB suggests that project teams be encouraged to maximize positive impact by incorporating creative mechanisms for addressing protection and restoration at various scales. Small-scale projects should not be overlooked simply because larger projects are presumed to have greater impact, because many smaller projects can demonstrate potential for ecosystem improvement beyond the local project area and/or significant local benefits. One way to achieve balance might be for project teams that propose larger projects to partner with smaller project teams so that the overall impact is both "impactful on the ground" and supportive of localized efforts.

To evaluate GLRI investments in terms of their ecosystem impact, particularly in large-scale projects, the agencies should establish a multidisciplinary panel and an efficient, science-based process for evaluating outcomes and expected impact. Measuring the ecosystem impact of individual GLRI projects and the program as a whole is too important to become lost in interagency bureaucracy. A standing panel of scientific agency, academic and stakeholder personnel should be utilized to facilitate a multidisciplinary review of potential impacts across multiple scales and multiple stressors.