

## **Comparison of Action Plan II and Action Plan III**

### **April 22, 2019**

**The Draft GLRI Action Plan III is very similar to the Action Plan II.**

- It is formatted the same: [Introduction (pp. 1-2); Summary of Focus Areas, Objectives, Commitments, and Measures (pp. 2-4); and a Body (pages 5-28) that devotes 2 pages to each of the Focus Area Objectives generally describing (with text and graphics) what's been accomplished so far under that particular Focus Area and what will be accomplished under GLRI Action Plan III.]
- It is based on the same 5 Focus Areas, comparable to the priorities now specified by Clean Water Act Section 118.
- It has similar Goals, Objectives, Commitments, and Measures with the exceptions noted below.
- Its targets, like the previous Action Plans, are ambitious but achievable.
- It uses the same color scheme for Focus Areas and has the same number of pages.

**Notable differences include:**

#### **Inclusion of Operating Principles (p. 2):**

- Operating principles that have guided GLRI planning and implementation are now expressly identified on page 2. Previously, the principles were addressed only obliquely, if at all.
- The “Partnership and Engagement” operating principle specifically calls out clearly communicated priorities and actions identified in Lakewide Action and Management Plans and Biodiversity Conservation Strategies for influencing development of annual GLRI priorities.
- The Great Lakes Advisory Board is not specifically called out in the “Partnerships and Engagement” operating principle because we did not have a Great Lakes-related federal advisory committee during the time of original drafting.

#### **Focus Area 1. Toxic Substances and Areas of Concern. Objective 1.1. Remediate, restore, and delist Areas of Concern (AOCs) (pp. 5-6):**

- In Action Plan II, we set a goal of implementing all management actions necessary for delisting at 17 AOCs through FY2019. We have completed all management actions at 12 AOCs thus far.
- For Action Plan III, the remaining AOCs are more complicated than those completed or targeted in Action Plans I and II because of complex contaminated sediment issues (i.e., any low-hanging fruit is gone). Therefore, in Action Plan III we have set a target of completing all management actions at five additional AOCs. Those five AOCs are not specifically identified in the Plan but will come from a list of 10 AOCs (out of the remaining 14 AOCs where management actions are yet to be completed).
- More Beneficial Use Impairments (BUIs) are targeted for removal during Action Plan III (43) than were targeted under Action Plan II (33). If we achieve this stretch goal, by the end of 2024 we will have removed over half of the total BUIs from U.S. AOCs, leaving 127 still to be removed.
- Since clear identification of the agreed-upon management actions that are needed to delist an individual AOC is a critical step, we have added a new measure: AOCs with a complete and

approved list of all management action necessary for delisting. We are targeting that all AOCs will have approved management actions lists by the end of APIII.

**Focus Area 1. Toxic Substances and Areas of Concern. Objective 1.2. Share information on the risks and benefits to humans of consuming Great Lakes fish, wildlife, and harvested plant resources (pp. 7-8):**

- Action Plan II focused primarily on educating consumers about the risks and benefits of eating Great Lakes fish. This important work will continue under Action Plan III, but we will also give increased emphasis to providing information to vulnerable populations about consuming wildlife and harvested plant resources (e.g., wild rice).

**Focus Area 1. Objective 1.3. Increase knowledge about (1) Great Lakes Water Quality Agreement Annex 3 chemicals in the Great Lakes; and (2) other priority chemicals that have negatively impacted, or have the potential to negatively impact, the ecological or public health of the Great Lakes (pp. 7-8):**

- Under Action Plan II, we had a commitment to identify “emerging contaminants” and assess their impacts on Great lakes fish and wildlife. In Action Plan III we have shifted the commitment to focus on acquiring increased knowledge about specific Chemicals of Mutual Concern identified pursuant to Annex 3 of the Great Lakes Water Quality Agreement with Canada, while (at BIA’s request) leaving room for increasing knowledge about “other chemicals”. The increased knowledge will come through GLRI support of discrete chemical monitoring activities.

**Focus Area 2. Invasive Species. Objective 2.1. Prevent introductions of new invasive species (pp. 9-10):**

- No change to the work, although a language change clarifies that prevention work is not limited to aquatic invasive species but also includes terrestrial invasive species (e.g. the Spotted Lanternfly and the Asian Longhorn Beetle).

**Focus Area 2. Invasive Species. Objective 2.2. Control established invasive species (pp. 11-12):**

- Work under this objective is similar; however, annual targets are more conservative than those in Action Plan II. This results from agreement by federal and state agencies to pursue a new strategy for control of established invasive species during Action Plan III that prioritizes *quality* of control efforts, rather than quantity, and includes resiliency and project sustainability.
- An additional measure in Action Plan II (tributary miles protected by GLRI-funded projects) was not included in Action Plan III – results can be included in the remaining “acres controlled” measure.

**Focus Area 2. Invasive Species. Objective 2.3. Develop invasive species control technologies and refine management techniques (pp. 13-14):**

- No substantive changes.

**Focus Area 3. Nonpoint Source Pollution Impacts on Nearshore Health. Objective 3.1 Reduce nutrient loads from agricultural watersheds (pp. 15-16):**

- The targets for annual phosphorus reduction are more aggressive (300,000 pounds) than in Action Plan II (but do not increase each year as they did in Action Plan II). This was a new

measure in Action Plan II and required some “ramping up”, but we believe we will now be able to maintain this target on a year-by-year basis.

- We have added a new commitment and associated measure for accelerating adoption of enhanced nutrient management practices.
- Two measures that did not have targets and were not necessary to accelerate` progress were dropped.

**Focus Area 3. Nonpoint Source Pollution Impacts on Nearshore Health. Objective 3.2. Reduce untreated stormwater runoff (pp. 17-18):**

- This objective has been modified to clarify that it addresses rural as well as urban communities.
- A measure has been added for miles of shoreline and riparian corridors restored or protected.
- Two measures that did not have targets and were not necessary in accelerating progress were dropped.

**Focus Area 3. Nonpoint Source Pollution Impacts on Nearshore Health. Objective 3.3. Improve effectiveness of nonpoint source control and refine management efforts (pp. 19-20):**

- Because of the importance of evaluating the work and progress in this Focus Area, we added an objective and associated commitments and measures to evaluate the effectiveness of nonpoint source control projects and develop new approaches for dealing with nonpoint source runoff. (This work was previously done under the aegis of objectives 3.1 and 3.2, one result of which was accelerated achievement of the Action Plan II phosphorus reduction target under Objective 3.1 as noted in the example on page 19 of the draft Action Plan III.)

**Focus Area 4. Habitats and Species. Objective 4.1. Protect and restore communities of native aquatic and terrestrial species important to the Great Lakes (pp. 21-22):**

- Action Plan III measure 4.1.1 combines Action Plan II measures that individually tracked coastal wetlands, shorelines, and other adjacent habitats. This combination represents a more comprehensive approach to addressing habitats related by similar coastal processes and similar stressors.
- Achievable target increments were developed for these measures by assessing agency contributions documented in the FY19 and FY20 budget and planning processes. Discussions with partners regarding capacity and future project interests indicated lower potential project opportunities compared to previous years.

**Focus Area 4. Habitats and Species. Objective 4.2. Increase resiliency of species through comprehensive approaches that complement on-the-ground habitat restoration and protection (pp. 23-24):**

- Language now emphasizes the need to increase the resiliency of species important to the Great Lakes.
- Efforts will focus on, but are not limited to, 17 species listed in the text box on page 24. Analysis of ongoing work indicates that these are the species for which significant protection or recovery is most likely during the next 5 years.

- Analysis not previously available has allowed us to set meaningful, quantifiable targets where previously we used less meaningful "number of projects" metrics.

**Focus Area 5. Foundations for Future Restoration Actions:**

- Action Plan II had objectives specifically focusing on climate resiliency and adaptive management. In Action Plan III, these concepts are now more generally addressed under the "project sustainability" and "science based adaptive management" operating principles found on page 2.

**Focus Area 5. Foundations for Future Restoration Actions. Objective 5.1. Educate the next generation about the Great Lakes ecosystem (pp. 25-26):**

- Work under Action Plan III will be the same as under Action Plan II. Rather than two measures focused on the same goal (educating youth), there's a single measure with that focus.

**Focus Area 5. Foundations for Future Restoration Actions. Objective 5.2. Conduct comprehensive science programs and projects (pp. 27-28):**

- With the shifting of several elements to Operating Principles (see above) this objective is more clearly focused on science. The commitment and measure pertain specifically to identification of cross-cutting science priorities and implementing projects to address those priorities.