

Record of Public Comments – Great Lakes Advisory Board (GLAB) Draft Recommendations September 2021.

The following attachments documents public comments requested on GLAB draft recommendations presented at the August 30-31st virtual meeting.



ALLIANCE *for the*
GREAT LAKES

Ms. Edlynzia Barnes
Designated Federal Officer for the Great Lakes Advisory Board
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Dear Ms. Barnes:

The Alliance for the Great Lakes is a nonpartisan nonprofit that has worked across the region since 1970 to advance actions to protect and restore the waters and resources of the Great Lakes. With more than 20 percent of the world's available surface fresh water supply, the Great Lakes and its water resources are integral to the public health, environmental sustainability and economic well-being of eight states and more than 40 million Americans.

We appreciate the Environmental Protection Agency's work to implement, in collaboration with other federal agencies and state and tribal partners, the Great Lakes Restoration Initiative (GLRI). We also appreciate the work of the Great Lakes Advisory Board (GLAB) to provide advice and recommendations to EPA on GLRI implementation, including its recent work to address a number of key questions related to GLRI's implementation. I write to you today to provide comments on GLAB's recent draft recommendations concerning GLRI.

Generally, we concur with many of the GLAB recommendations. One overall comment related to document would be to format the document so that the background information and GLAB recommendations for each program area and charge question is presented consistently so that public transparency is increased. In addition, we strongly support efforts and recommendations to advance environmental justice for the GLRI program, particularly those contained in the enclosed report *Procedural Justice within the Great Lakes Restoration Initiative: Next Steps Towards Environmental Justice Report* prepared for the Healing Our Waters-Great Lakes Coalition in 2020 (copy attached).

Our detailed comments on GLAB's draft recommendations, organized by topic area and charge questions, follow:

Nutrients

EPA requested that GLAB provide input on the following question: *“Please identify any strategies, using traditional or innovative technologies or methods, to reduce legacy phosphorus within the Lake Erie watershed (and other Great Lakes and tributaries thereto).”*

We generally support the GLAB recommendations related to nutrients and we strongly support the GLAB recommendation that “a regulatory approach may be required including, but not limited to, fertilizer applicator certification; seasonal and weather-related restrictions on nutrient application; mandatory nutrient management plans; and inspection and management of home sewage treatment systems.” Accordingly, we encourage the agencies involved to build measurable accountability across all aspects of programs involved in Great Lakes Water Quality Agreement and Great Lakes Restoration Initiative (GLRI). To that end, we recommend the following:

Create shared leadership and joint management:

To enhance shared leadership with respect to the protection and restoration of Lake Erie, EPA’s Office of Water should work with Region 5 and the Great Lakes National Program Office to oversee the development and coordination of regulatory, management and restoration activities, including data management and reporting, of agencies participating in protection and restoration of Lake Erie. EPA can strengthen accountability by ensuring comprehensive evaluation reporting on key challenges to protect and restore Lake Erie and work with broader stakeholders to improve governance. This could take the form of an Annex 4 Stakeholder advisory group or a reconvening of the Annex 4 committee to include stakeholders. It is important to more meaningfully involve both upstream and downstream stakeholders to ensure their voices are heard to ensure effective use of funding and disproportionate impact from nutrient pollution.

Improve stakeholder role in participation and governance:

EPA should work with the Great Lakes states to form a stakeholder advisory committee and draft an Action Plan and Progress Report that will: (i) outline actions that can be taken to address recommendations made in the preliminary Lake Erie Status Report; (ii) outline a potential revised governance structure under Annex 4 that incorporates broader participation in decision making from stakeholders and communities directly impacted by harmful algae blooms; and (iii) assess nutrient reduction trends to measure how Lake Erie nutrient levels and harmful algae blooms are responding to actions prescribed by the U.S. EPA and the Great Lakes states in order to achieve the 40% phosphorus loading reduction commitment by 2025; and (iv) recommend regulatory and management steps to improve progress in restoring and protecting Lake Erie.

Ensure existing management and regulatory actions are monitored, audited and enforced:

It is critical for the GLRI program to work in concert with the regulatory programs of the EPA to ensure compliance is monitored and enforced on existing regulations such as National Pollutant Discharge Elimination System (NPDES) permit program permits for Concentrated Animal Feeding Operations (CAFO), especially considering the role of manure applications play in annual and legacy phosphorus build up in the soil and water. It is also important that these

programs work together to foster new ideas that are complimentary to a hybrid voluntary and regulatory management system. This means setting clear benchmarks for water quality performance when working with grantees and other agencies receiving GLRI money such as National Resource Conservation Department (NRCS), state departments of agriculture and natural resources, as well as conservation districts. It is also important to set and/or encourage via GLRI and Annex 4 contingency plans if those benchmarks are not met. Those contingency plans should include a ratcheted accountability framework to ensure reductions are accounted for and tax payer investment is valued.

Ensure that agencies involved are expected to measure performance against water quality targets where they exist and are striving to make them time bound:

We strongly encourage the GLRI program and Annex 4 team to work with other agencies to create key performance indicators that are based on set water quality targets. Examples of set water quality targets are approved Total Maximum Daily Loads (TMDL), the time bound Annex 4 and western Lake Erie Collaborative state and province targets, and Green Bay's local basin-wide time bound targets.

Invasive species

The GLAB was asked to provide advice and recommendations on this charge question related to invasive species: *“Balancing the need for continued commercial, recreational, and other activities on the Great Lakes, what innovative actions could reasonably be taken to accelerate the control of existing invasive species, and what methods or strategies can be deployed to prevent the establishment of future infestations?”*

We agree with many of GLAB's recommendations related to invasive species and we would like to highlight three areas that deserve additional detail and attention. First, the GLAB correctly notes that Transport Canada has imposed numeric ballast water discharge standards for all vessels entering Canadian ports beginning in September 2024 so as to protect against the spread of invasive aquatic species. For vessels constructed prior to 2009 and operating exclusively on the Great Lakes Transport Canada has provided an extended schedule to September 2030 to comply with its standards. The GLAB document correctly notes that EPA has issued draft rules related to vessel ballast water discharges. However, unlike Canada, EPA's draft rules exempts vessels operating exclusively on the Great Lakes from numeric ballast discharge standards. This is problematic as it exempts a large percentage of vessel transport from regulation and we agree with the GLAB that EPA's regulations and standards for ballast water discharge standards on the Great Lakes should be harmonized with Canada's rules so as to provide greater protection to Great Lakes aquatic resources. Accordingly, we would further elaborate the GLAB draft recommendation to include a specific charge to EPA that EPA modify its draft regulation to impose ballast water discharge standards for all vessels, including those operating exclusively on

the Great Lakes, and that all vessels operating on the Great Lakes come into compliance not later than September 2024 (or September 2030 if the vessel was constructed prior to 2009).

Second, we also agree with the recommendation that early detection and rapid response is one of the most promising ways to deal with invasive species before they are established. To that end, we recommend that GLAB consider expanding its recommendation to include more coordination among Great Lakes states and federal agencies and funding devoted on efforts, including research and monitoring, to advance this capability in the Great Lakes region.

Lastly, we would like to see more mention of structural measures, including projects such as Brandon Road Interbasin Project, designed to safeguard aquatic ecosystems. These projects may benefit from tighter coordination with restoration efforts and sustained support, monitoring, public reporting and engagement.

Community Focus

The GLAB was asked to provide recommendations on the following question: *“How well are EPA and its federal, state and tribal partners communicating the goals, challenges and accomplishments of GLRI? Are there stakeholder 2 groups that could be more effectively communicated with? What additional and/or innovative tools could be used to improve outreach to citizens, elected officials and partners?”*

We agree with GLAB that GLRI’s five year action plan is a focus of planning for GLRI investment. However, we also note that the five year action plans are based upon a program strategy that was developed many years ago prior to the full recognition and threat posed by climate change and extreme weather events, as well as prior to the emphasis on environmental justice and recognition that environmental grant programs need to do a better job of increasing the share of environmental benefits for communities of color, indigenous and low-income communities that have often born the burden of environmental degradation.

Given that the strategy was developed so long ago we believe that GLAB should consider including a recommendation that EPA reconvene the Great Lakes Regional Collaboration created under Executive Order 13340 and direct it to review, revise, and reissue the strategy document that has been guiding the GLRI program to embed the priorities of environmental justice and climate change as significant environmental and natural resources issues involving the Great Lakes.

We also believe that is important to expand and prioritize community engagement with underserved communities and for the agencies to use existing authorities to the maximum extent

practicable to waive cost-share requirements, lowering the financial barriers for projects in low-income and disadvantaged communities.

As for Public Advisory Councils which guide work related to the cleanup of Great Lakes Areas of Concern, we believe it important that standards be set for community representation and that EPA ensure that Public Advisory Councils in each AOC undertakes robust community engagement to ensure that AOC projects are meeting community needs and GLRI funding should be provided to Public Advisory Councils to conduct robust engagement and ensure inclusive representation.

As the Great Lakes Restoration Initiative enters its second decade, it is necessary to make the program even stronger by focusing on oft-neglected communities. Refinements to the GLRI strategy and community engagement process can accelerate restoration progress while ensuring that communities most impacted by pollution benefit from restoration investments. We think that the emphasis on environmental justice and community engagement could be further strengthened in GLAB's recommendations. Thank you for the opportunity to provide comment on these important issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Don Jodrey', with a stylized flourish at the end.

Don Jodrey
Director of Federal Relations

Attachment



September 16, 2021

RE: Great Lakes Advisory Board Draft Recommendations

To Whom It May Concern,

Thank you for the opportunity to provide comments on the Great Lakes Advisory Board's (GLAB) draft recommendations. On behalf of Ducks Unlimited, I wish to thank the United States Environmental Protection Agency for the tremendous partnerships that have been built within the states and nonprofit community since the inception of the Great Lakes Restoration Initiative (GLRI). The effort to restore this globally significant resource has been monumental and is an emblem of what collaborative conservation at-scale can look like. Thank you in advance for the time and consideration.

Theme 1: Seek Advice and Recommendations on Innovative Strategies to Address Legacy Phosphorus

- We are supportive of looking for ways to identify Critical Source Areas to focus best management practice implementation. Further, we support consistent prioritization of sub-watersheds within the various lake basins to drive an increase in strategically made conservation investments that provide the greatest nutrient reduction benefits.
- We are pleased to see a strong emphasis on the identified ways to trap phosphorus and sediment, including the use of wetlands. That said, we want to ensure that an emphasis on the Natural Resource Conservation Service's Avoid/Control/Trap program do not lead to an over-reliance on NRCS project construction standards that could stymie implementation of good projects that yield multiple benefits.
- We are supportive of the program looking at ways to address long-term monitoring needs and ways to fund it. Monitoring requirements on GLRI applicants can in some cases place large burdens on organizations and agencies responsible for delivering projects. We suggest that a separate GLRI project monitoring program be developed in coordination with academia or the private sector to ensure an appropriate accounting of water quality benefits provided by GLRI projects is done.

Theme 2: Seek advice and Recommendations on Managing Excess Nutrients

- We once again support the identification of Critical Source Areas as referenced in this recommendation and agree that GLRI should support Structural Nutrient Removal systems (wetlands are part of this) and monitoring.
- We also agree that there needs to be more coordination of GLRI funding and technical expertise to develop regional tools to implement the most effective BMPs. We hope that cross-jurisdictional coordination can be improved so that the available GLRI funding can be utilized in the most cost-effective way possible.
- DU supports the market-based approach recommendations provided and have existing professional experience with how market-based incentives can drive on-the-ground conservation work.



Theme 3, 5, and 6: Seek Advice and Recommendation on GLRI

- DU supports keeping the 5-year action plan
- We don't recommend changing the name of GLRI to Great Lakes Management Initiative and feel that a name change will simply cause confusion and erode the high-level of programmatic awareness and recognition that the GLRI currently enjoys.
- We recommend that land acquisition become a more accepted and prioritized use of GLRI funds. Currently is partners wish to protect and restore land to achieve the goals of the GLRI, other resources must be found to cover costs associated with the land acquisition piece of restoration. This can be a significant burden for many nonprofits and agency partners and limit the number of projects that can be done. Allowing GLRI funds to be utilized for the full suite of environmental restoration activities, including long-term land protection, is strongly recommended.

Thank you in advance for your time and consideration. We look forward to the continued dialogue around how we can make the GLRI even more effective and deliver even greater restoration victories.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Hill", with a long horizontal flourish extending to the right.

Jason Hill
Director of Conservation Programs
Ducks Unlimited
jhill@ducks.org
(734) 623-2019

CC:

James Rader, Director of Operations, Ducks Unlimited
Kyle Rorah, Director of Public Policy, Ducks Unlimited
Laura Rubin, Director, Healing Our Waters Coalition

September 16, 2021

Edlynzia Barnes, Designated Federal Officer
U.S. Environmental Protection Agency
barnes.edlynzia@epa.gov

Re: Comments on Great Lakes Advisory Board Draft Recommendations on Nutrients

Dear Ms. Barnes,

I am providing comments to the U.S. Environmental Protection Agency (USEPA) on the Great Lakes Advisory Board (GLAB) Draft Nutrients Workgroup report, made available at the Great Lakes Advisory Board Meeting, August 30-31, 2021 (<https://www.glri.us/node/423>). I appreciate the GLAB effort to address nutrients and impacts of excessive levels in Lake Erie. My comments focus on three issues related to identifying approaches to better address excessive nutrients in Lake Erie: 1. The importance of acknowledging recent work of the International Joint Commission (IJC); 2. The importance of giving appropriate emphasis to all potentially useful approaches to reducing excessive nutrients in the Lake Erie basin; and 3. The importance of citing additional relevant research.

The GLAB report should acknowledge recent IJC work.

As USEPA and the GLAB Nutrients Workgroup members would be aware, there is significant research and assessment work that has been underway in the Great Lakes basin for many years addressing nutrient issues, including excessive loadings and eutrophication in Lake Erie. Much of the assessment work has been carried out by the IJC through multiple work groups, two of which I have led (including the ongoing Nutrients Synthesis Work Group), and other work groups on which I have served. Two recent projects are particularly relevant to the Draft Nutrients Workgroup report. A 2018 report reviewed earlier data on the relative contributions of commercial fertilizer and manure application to phosphorus loadings in the western Lake Erie basin (WLEB), noting that commercial fertilizer represented the majority of phosphorus applied within the watershed, though manure phosphorus was not insignificant. The report also included multiple recommendations, including related to legacy phosphorus and additional programs and activities that could help address WLEB eutrophication.¹

A 2019 report of the Great Lakes Water Quality Board examined the issue of animal feeding operations (AFOs) as contributors of nutrients in the WLEB watershed, with recommendations addressing multiple issues, including data gaps and potential new policies.² This report was

¹ International Joint Commission, 2018. Fertilizer Application Patterns and Trends, and Their Implications for Water Quality in the Western Lake Erie Basin. Prepared by the Great Lakes Science Advisory Board for the International Joint Commission (Allan, J.D., Murray, M. and M. Child, co-authors). Available at <https://www.ijc.org/en/fertilizer-application-patterns-and-trends-and-their-implications-water-quality-western-lake-erie>.

² Great Lakes Water Quality Board, 2019. Oversight of Animal Feeding Operations for Manure Management in the Great Lakes Basin, a report submitted to the International Joint Commission by the Great Lakes Water Quality Board. <https://ijc.org/en/wqb/oversight-animal-feeding-operations-manure-management-great-lakes-basin>.

followed by outreach efforts and broader input on recommendations concerning AFOs, summarized in a subsequent report,³ which in turn has spurred the formation of the Toward Implementation of a Manure Management Framework work group, coordinated by the Great Lakes Water Quality Board. All of these efforts resulted in findings and recommendations that are relevant to adopting policies to address excessive nutrient loadings in both the U.S. and Canada, and it would be beneficial for the GLAB to consider these recommendations in developing recommendations for addressing excessive nutrients in Lake Erie.

The GLAB report should reference and emphasize all potentially useful approaches to addressing excessive nutrients in Lake Erie.

The GLAB Draft Nutrients Workgroup report addresses two charge themes, on approaches to addressing legacy phosphorus and approaches to managing excess nutrients. Concerning legacy phosphorus, the IJC Fertilizer Application Work Group report cited above has extensive discussion on the issue, which is discussed further in the technical report on which the work group report was based.⁴ Concerning approaches to managing excess nutrients, both of the IJC efforts mentioned above address the issue. Nutrient management (e.g. through the 4R program) is discussed in some detail in both the Fertilizer Application Work Group report (2018) and the contractor report, and I believe the approach is worthy of greater emphasis within the GLAB Draft Nutrients Workgroup report, as a relatively simple approach that can provide significant benefits, including with the potential for increased adoption in the WLEB. Concerning animal feeding operations, there are outstanding questions on current contributions to nutrients in the WLEB. In any case, given what is known about the manure contributions of phosphorus, it would be appropriate for the GLAB Draft Nutrients Workgroup report to have more emphasis on approaches to addressing manure phosphorus, drawing as appropriate on the recent IJC work and other findings and recommendations from the literature.

The GLAB report should reference additional literature relevant to excessive nutrients in Lake Erie.

One important area of research on agricultural nutrients underway for some time concerns field-scale research. Edge-of-field and similar studies can help assess the effectiveness of particular best management practices (BMPs) and contribute to better understanding nutrient dynamics in fields, which can also inform both potential project and program implementation as well as identify further research questions. The GLAB Draft Nutrients Workgroup report would benefit

³ Great Lakes Water Quality Board, 2020. Oversight of Animal Feeding Operations for Manure Management in the Great Lakes Basin – Summary of Insights Learned Through Webinar Input, Prepared by the Great Lakes Water Quality Board, submitted to the International Joint Commission, October 16, 2020.
<https://ijc.org/en/wqb/oversight-animal-feeding-operations-manure-management-great-lakes-basin>.

⁴ LimnoTech, 2017. Assessment of Fertilizer and Manure Application in the Western Lake Erie Basin. Completed for the International Joint Commission Science Advisory Board's Science Priority Committee. 120 pp. + appendices. https://legacyfiles.ijc.org/publications/LimnoTech_IJC_Fertilizer.pdf.

by providing reference to such work, which was reviewed in both the IJC Fertilizer Application Work Group report and LimnoTech (2017), and has been the subject of subsequent research.⁵

In addition, key citations should be provided where appropriate in the GLAB Draft Nutrients Workgroup report. For example, the Summary section on p. 5 notes: “A recent analysis of the data collected at Ohio USDA-ARS edge-of-field monitoring locations indicate that soil legacy P contributes 80% of the P loss and newly applied (excess P) from fertilizer/manure contributes the remaining 20%.” The statement is not cited, and given the importance of this conclusion concerning the document’s emphasis of particular practices to address phosphorus, it is important for the reader to know the source of the finding. On the same topic, although it is clear that legacy phosphorus can be an important contributor to inputs to Lake Erie, research has also indicated the importance of addressing continuing phosphorus inputs to the watershed,⁶ a point made in the draft report, but which could benefit by further emphasis.

In summary, I appreciate the efforts underway by the Great Lakes Advisory Board to address excess nutrients in Lake Erie, and believe addressing the points here on other assessments to consult, considering additional approaches to emphasize, and additional literature to review, would lead to a report with recommendations that can better address the excess nutrient problems in Lake Erie.

Sincerely,

Michael W. Murray, Ph.D.
Adjunct Associate Professor
University of Michigan, School for Environment and Sustainability

⁵ See review of broader work in Macrae, M., Jarvie, H., Brouwer, R., Gunn, G., Reid, K., Joosse, P., King, K., Kleinman, P., Smith, D., Williams, M., & Zwonitzer, M. 2021. One size does not fit all: Toward regional conservation practice guidance to reduce phosphorus loss risk in the Lake Erie watershed. *J. Environ. Qual.* 50:529–546. <https://doi.org/10.1002/jeq2.20218>.

⁶ Guo, T., Johnson, L.T., LaBarge, G.A., Penn, C.J., Stumpf, R.P., Baker, D.B., Shao, G., 2021. Less agricultural phosphorus applied in 2019 led to less dissolved phosphorus transported to Lake Erie, *Environ. Sci. Technol.* 55 (1), 283-291. DOI: 10.1021/acs.est.0c03495.

From: [Amy Beyer](#)
To: [Barnes, Edlynzia](#)
Subject: Comments on GLAB Charge Question #5 from CRA
Date: Friday, September 17, 2021 3:51:45 PM

Hello Ms. Barnes – please accept the following comments from the Conservation Resource Alliance.

Charge Question #5 to GLAB: As we enter the next decade of GLRI funding, what are appropriate annual ecological and community based outcomes (coupled with appropriate baselines and monitoring) to show that we are making progress in the areas of AOC remediation and delisting, invasive species control and prevention, nutrient reduction, and habitat restoration and protection, such that we can show a good return on investment?

With perspective from our five-plus decades of on-the-ground watershed restoration, we would suggest the following:

- A. There's no recognition in the strategy of the overall ecological function importance that comes from high-quality stream/river inputs. Shouldn't that be mentioned?
- B. Outcomes – suggest an added outcome of “miles of stream habitat improved” – there are very straightforward baseline conditions and measurements for this.
- C. Outcomes – suggest an added outcome of “reduction in excess sediment inputs” – yes, this is most important only in certain parts of the Great Lakes system, but in conjunction with the concept in A) it would seem to be important. (sediment is not mentioned in ANY outcomes)

Thank you for the opportunity to comment, and for the Advisory Board's diligent work to restore the Great Lakes!

Amy Beyer, Director
Conservation Resource Alliance
10850 E. Traverse Hwy., Suite 1180
Traverse City, MI 49684
Office: 231-946-6817
Cell: 231-499-9438

cc: Restoration Committee representatives (15 watersheds in northwest lower Michigan)



Great Lakes Advisory Board

Attn: Edlynzia Barnes

Sent via email: barnes.edlynzia@epa.gov

September 16, 2021

Dear Ms. Barnes,

We are writing to offer feedback on the Great Lakes Restoration Advisory Board Draft Recommendations from the August 30-31 board meeting. The Wisconsin Wetlands Association (WWA) is a non-partisan, science-based, organization dedicated to the protection and restoration of wetlands. We advocate for wetlands as solutions that can help address a variety of concerns like flooding or drought, water quality impairments, and declining habitat. We partner with municipalities, farmers, and landowners all connected by the need and desire to address these problems.

Wetlands and well-connected floodplains are foundational to healthy watersheds across the coastal areas of the Great Lakes Region. Yet the condition of wetlands and floodplains in this region are highly degraded, disrupting their ability to store and slow water, filter nutrients, and provide critical habitat. Our comments on the GLRI recommendations focus on the need to address wetland and floodplain degraded hydrology as a root cause of water management problems to improve the health of our Great Lakes watersheds.

Draft Nutrients Workgroup Report – Theme 1 (Watershed-Based Strategies)

WWA COMMENT: INCLUDE FLOODPLAIN RECONNECTION. Many rivers and streams have been straightened and channelized over the course of the last century and are severely disconnected from their floodplains. Floodplain disconnection contributes to erosion and runoff, as well as flooding, debris transfer, and public infrastructure damage. In their description of ‘Controlling Practices,’ the Draft Nutrients Workgroup Report discusses nutrient transport through the watershed, which underscores that runoff management is in part a hydrology-driven problem. However, the workgroup’s examples of transport pathway control practices that GLRI should foster fail to mention floodplain reconnection. The most resilient waterways with the greatest nutrient and flood water storage benefits are connected to their adjacent floodplain. The GLRI should encourage and support practices that reestablish hydrologic floodplain connections.

WWA COMMENT: INCLUDE NATURAL FLOOD MANAGEMENT. Natural flood management solutions repair degraded conditions caused by fluvial erosion hazards and restore upper watershed floodplain and wetland functions such as storing water, reducing the energy of floodwaters, and reducing erosion and sedimentation. NFM solutions often complement culvert replacement and protect infrastructure investments by improving the ability of road crossings to pass flows, sediment, and debris during storms. Natural flood management practices also yield benefits for nutrient and sediment reduction, as well as habitat improvement, and should be included.

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Helping people care for wetlands

Draft Nutrients Workgroup Report – Theme 2 (Managing Excess Nutrients)

WWA COMMENT: INCLUDE UPPER WATERSHED WETLAND AND FLOODPLAIN RESTORATION. The Draft Nutrients Workgroup Report recommends focusing on managing excess nutrients in lower watershed tributaries. While this strategy should be in the mix of practices, it should not mean that upper watershed strategies are sidelined. There are many opportunities for upper watershed wetland and floodplain restoration and the benefits for nutrient storage also mean less excess phosphorus and nitrogen flowing into lower watershed areas and lakes. Managing excess nutrients should include work that can be done in upper watershed areas with the understanding that these upstream benefits accrue downstream.

Similarly, with respect to flooding, the unintended consequence of too much emphasis on proximity to the Great Lakes coastline is that upper watershed work in ‘inland wetlands’ that can have compounded benefits receive lower priority. There should be a tract of funding for upper watershed work especially for mitigating flooding.

Draft GLRI Workgroup Report – Theme 5 (Outcome Based Investments in the Great Lakes)

WWA COMMENT: FUND HYDROLOGIC RESTORATION DEMONSTRATION PROJECTS. The draft workgroup report recommended “moving from restoration to protection and prevention” to invest long-term. Too often restoration has been singular in purpose (i.e., improving habitat) and random in practice, which may have led to this recommendation. But given the large amount of historic disturbance in Great Lakes watersheds, it is impossible to achieve GLRI goals without an ongoing emphasis on restoration. WWA encourages the GLRI program to fund hydrologic restoration demonstration projects to showcase how restoring natural features like upper watershed wetlands and floodplains can improve an area’s hydrologic conditions, connections, and functions. These projects are multi-objective and yield results across GLRI priorities such as reducing non-point source pollution and increasing ecosystem benefits. GLRI investment in hydrologic restoration demonstration projects will grow diverse stakeholder interest and investment in addressing watershed problems.

Draft Ecological Workgroup Report - (Recommendations on Charge Questions 5 & 6)

WWA COMMENT: HYDROLOGIC RESTORATION MAXIMIZES INVESTMENT. The issues facing the Great Lakes are urgent and widespread. They cause tremendous economic damage and are costly to address. It is imperative that we maximize the benefits of every dollar invested through the GLRI. A single hydrologic restoration project may yield benefits for public safety, resilience, water quality, habitat, fisheries, agriculture, transportation infrastructure, and more. WWA recommends that to improve the value of investment, GLRI encourage hydrologic restoration projects.

Our recommendations to maintain a focus on restoration and to emphasize repair of degraded hydrology as a root cause are consistent with recommendations contained in The Society for Ecological Restoration’s recently released [*Principles for Ecosystem Restoration to Guide the United Nations Decade 2021-2030*](#). The report highlights the need to halt, prevent and reverse ecosystem degradation,

and to effectively restore degraded terrestrial, freshwater, and marine ecosystems across the globe. The United Nations General Assembly passed Resolution 73/284, declaring 2021–2030 as the United Nations Decade on Ecosystem Restoration. The report explains:

“Restoration activities should concurrently address the direct and indirect causes of ecosystem degradation and fragmentation, and the loss of biodiversity and ecosystem goods and services. If the causes are not addressed, restorative activities may fail over the long term. During the planning phase of restoration projects, programmes or initiatives, the degree and causes of degradation should be identified, and actions should be developed to reduce and mitigate their impacts at the appropriate scale.”

The restoration of hydrologic systems must be a priority of state and federal efforts to improve our Great Lakes and the watersheds within the Great Lakes basin. The recommendations we’ve put forward are intended to make the restoration that our programs incentivize smarter and more impactful. We appreciate the Board’s efforts to examine ways to improve this important program and gather feedback from stakeholders who have used the Great Lakes Restoration Initiative to accomplish meaningful work.

Sincerely,

Jennifer Western Hauser, Policy Liaison

Wisconsin Wetlands Association

Email: Jennifer.westernhauser@wisconsinwetlands.org

VIA EMAIL ONLY

September 16, 2021

Dear Great Lakes Advisory Board,

Buffalo Niagara Waterkeeper (BNW) submits the following comments regarding the August 30-31, 2021 Great Lakes Advisory Board (GLAB) Meeting.

BNW is a nonprofit organization whose mission is to restore and protect our water and surrounding ecosystems for the benefit of current and future generations. We protect clean water, we restore the health of ecosystems, we connect people to water, and we inspire economic growth and community engagement.

BNW has a 30-year track record of success, ranging from effective environmental advocacy and natural resource planning, to successfully managing the design and implementation of envisioned projects, all while engaging tens of thousands of people through volunteerism and environmental education. Our most visible success has been our leadership efforts around the restoration of the Buffalo River, specifically serving as a cost-share partner and helping secure \$75 million in local, state, federal and private corporation resources for contaminated sediment dredging and habitat restoration. BNW has been the official Remedial Advisory Committee (RAC) Coordinator for the Buffalo River Area of Concern (AOC) since 2003.

We appreciate the Board providing opportunity to comment. BNW provides the following comments. Questions or feedback can be directed to Margaux Valenti, Legal & Program Advisor and Buffalo River RAC Coordinator, at Mvalenti@bnwaterkeeper.org.

- I. New York State Representation.
 - a. Home to two Great Lakes, the St. Lawrence River, six AOCs and 400 miles of Great Lakes Coastline, New York State is a Great Lakes State. The Board make-up consists of no representatives from a New York agency. This federal advisory board should reflect a comprehensive representation of the entire Great Lakes Basin.
 - b. Charge Question 2 is related to the Harmful Algal Blooms in Lake Erie yet makes no mention of New York. It is well understood that the dangers of HABS disproportionately impact the Western Basin of Lake Erie so the presentation and conversation should either include New York and assess Lake Erie holistically or note that the intent of the conversations is limited to the Western Basin of the Lake and the affected states.
- II. Recommendations for Charge Questions 3 & 5: AOCs and Community Outreach
 - a. LAMPS: Despite BNW's role as AOC Coordinator for almost 20 years, we still struggle to understand the functionality of the LAMPS as a "life after AOC" tool.

In fact, the Buffalo River is not a “connecting channel” so it is not listed in the Lake Erie Lamp beyond being named in an Appendix as an AOC. We agree with the questions raised during the meeting regarding this topic and encourage the EPA and state agencies to further refine the applicability of the LAMPS to local AOCs.

- b. Regarding the comments made on bolstering the amount and diversity of community engagement: BNW’s leadership and proven track record as an AOC Coordinator demonstrates that community-based organizations play a unique and critical role in increasing public involvement in technical processes and conversations. As a non-governmental organization, BNW has greater flexibility with who and how to communicate with the public sector about GLRI and AOC needs. For example, BNW has less constraints on how we are able to utilize social media and hold social gatherings than the requirements of an agency. We encourage the EPA to model this approach in other areas throughout the basin and bring more community-based organizations into AOC management and leadership.
- c. Community Engagement at GLAB Meetings: The meeting could be better publicized by utilizing more community groups to promote the meeting to a larger audience. The recent emails from Healing Our Waters Coalition (HOW) are a perfect example. In addition, beginning the meetings with a brief overview of what the Board is and does, how the “charge question” process operates, and the intended goal of the meeting would provide much needed context to those members of the public who are unfamiliar with the process. The meeting can be difficult to follow and understand without being fully engrained in the process, which can cause further barriers to public engagement. In addition, providing charge questions and information in advance of the meeting, and continuing with a remote option will enhance participants’ understanding of the materials and garner increased participation.

Thank you for the opportunity to comment.

Respectfully Submitted,

Margaux Valenti, Esq.
Legal and Program Advisor
Buffalo Niagara Waterkeeper

My comments:

1 the recommendations are all very well thought out and it was obvious the folks involved took a lot of time on these – so great job! In addition to my regular job as Environmental Affairs and Community Development for Bay County Michigan, I am a Chair of the Partnership for Saginaw Bay – an Area of Concern (AOC) so I wanted to at least offer my insight from a local perspective. They are all very good ideas, but it's also how we put them into practice – on the ground - that seems to lack definition or teeth.

Regarding the charge to 1 & 2 – Legacy P remains the big gorilla in the room. Lake Erie Maumee Bay and Saginaw Bay are very similar in structure, character and surrounding land use and they should be treated and addressed and mentioned in the same way.

Monitoring is needed but monitoring won't change the numbers. Better integration and oversight of performance efficacy of on-farm conservation practices must be tied to any state and federal ag funding or ag insurance rating. This is tedious but this where the rubber meets the road and we need to spend some time on this to effect real change.

Regulatory agencies should allow flexibility to encourage and explore creative trapping and removal practices and methods in the Nearshore area as this is where the problems reveal themselves with dense growth matts, biomass impactions on the shoreline and muck on the beaches, etc. This is also where the Beneficial Uses are impaired. Outside of the Saginaw Bay nearshore – is the larger Lake Huron which has seen depleted levels of zooplankton and phytoplankton – so the problem of high nutrients is not universal but located in the Nearshore.

Regarding the charge to 4: Can't add anything to the thoughtful recommendations made on this difficult and complex issue.

Regarding the charge to 3, 5 & 6: Regarding 3, There is a significant disconnect in many Great Lakes communities about what GLRI does, its benefits and how it works. It seems out of reach to them or done 'by others'. We hear about Universities studying the area (but have to pay to read any results) but oftentimes don't hear about how the data is used or we just hear about further studies. My suggestion after all this time (20 years) is for the GLRI funders to build into the project timelines – the requirement that all GLRI applicants obtain a Resolution of Support from Counties affected by the proposed project. If you want people to know what's happening in a defined area you must tell them. This would elevate their local knowledge, foster greater local participation, and of course – support for GLRI. Then require GLRI Project managers to report out at the end of the study, project, etc to the local Board of Commissioners, local media, etc.

In the Saginaw AOC we have Universities coming in from all over to study our shoreline or water quality and we almost never hear about the projects or any results or findings – oftentimes we find that THEY don't even know an earlier similar study was done by a different funding agency. Let's do better job of engaging the affected geography. It will pay off with much greater participation and numbers of supporters of GLRI.

Thank you for at least reading my comments,

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