

Introduction

The Great Lakes and St. Lawrence Cities Initiative (Cities Initiative) is pleased to submit comments on the draft strategy and action plan developed by the Great Lakes Regional Collaboration (GLRC) and released in Duluth, Minnesota on July 7, 2005. Many representatives from members of the Cities Initiative have participated in the strategy teams, so we are familiar with the process followed by the GLRC and with much of the draft document. This has been an excellent effort to date, and the draft document reflects a great deal of hard work and good thinking. The real challenges lie ahead with the completion of the strategy and action plan, obtaining the necessary funding, and implementing the actions.

U.S and Canadian Cooperation

The Great Lakes are a shared resource between the United States and Canada, and there is almost a century of cooperation between our countries to protect the resource. Although circumstances were such that it was necessary for the United States to proceed on the GLRC with Canadians as observers, the outcomes of the GLRC must be fully integrated with Canadian programs so that we can move forward together in our efforts to protect and restore the Great Lakes.

Priorities

We understand that the GLRC is interested in what Great Lakes stakeholders consider the highest priority work in the basin. This is always a difficult task, but it is important to set priorities. In designating these priorities, we need to emphasize that by doing so, we are saying that this work must come first, but not to the exclusion of many other tasks. These are also important, and must be funded over the longer term. The Cities Initiative considers the following as the top priorities:

- 1. Eliminate discharges of untreated or inadequately treated human and industrial waste during wet weather (Coastal Health – Recommendation 1)**– The volume of domestic, industrial and other waste that enters the Great Lakes during wet weather via CSO/SSO events or storm water discharge is totally unacceptable and must be stopped. The nature and severity of this waste is also a great concern. Because of the magnitude of the investment needed, it must be shared at federal, state, and local levels and spread out over the appropriate length of time. Storm water discharge may contain human waste even in communities with separated systems due to infrastructure

breakdown and also industrial and household hazardous wastes from illegal dumping

2. **Stop the introduction of new aquatic invasive species into the Great Lakes ecosystem (Invasive Species – Recommendation 1)**– With more than 180 species already in the Great Lakes, the biological balance is severely disrupted and vulnerable to even more damage with each new species. It is time for the federal government move forward aggressively with comprehensive federal legislation to keep new invaders out and to focus in the near term with existing authority on ballast water discharges to cut off that primary pathway to new introductions.
3. **Protect and restore wetlands in the basin with a special emphasis on coastal areas (Habitat/Species Recommendation 2; Nonpoint Source – Recommendation 1)** – Wetlands are probably the most important building block of a healthy ecosystem, and we must protect the remaining ones we have with great vigilance. Well over half of the wetlands in the basin have been lost over the years, and the trend must stop now. The importance of wetlands is reflected in both the Habitat and Non Point Source Strategy Team reports, and also relates to coastal health. Wetlands, as a buffering system, would also improve the quality of wet weather discharge in the form of storm water.
4. **Clean up Areas of Concern (AOC/Sediments – Recommendation 1)** – We have known the most seriously contaminated areas within the basin for some time and have failed to restore them to health. Progress has been much too slow. More funding for cleanup is the top priority, but building capacity at the federal, state, tribal and local levels, much stronger management and accountability in the cleanup process, and better coordination among federal agencies and with state, tribal, and local authorities are close behind.
5. **Revitalize waterfronts (New Recommendation – Part of Sustainability)** – Many miles of waterfronts on the Great Lakes were dedicated to industrial uses over 100 years ago and the contamination from those uses remain, even after much industry has left or shut down. This waterfront property has tremendous potential to revitalize many of our urban areas, and is doing so already in some areas. We have the opportunity to do it right this time, where the waterfronts can support a multitude of recreational, environmental, residential, commercial, and other uses, while protecting the fundamental integrity of the resource. Revitalization should take place using the principles of sustainable development.

These are the areas where the Cities Initiative believes the GLRC should focus its primary attention, time, money, and other resources in the near term, while laying the groundwork for many more actions to follow.

Invasive Species

As noted above, action on this issue is our second highest priority. In addition to the primary importance of comprehensive, national legislation and immediate action on

ballast water, including no ballast on board ships, the GLRC should create a capability for rapid response and management. Because each new species presents a potential major threat, every means possible should be taken to stop the introduction, or to eradicate the species if it is introduced. This capability would at least create the possibility of promptly eradicating a new species or limiting its spread.

Habitat and Species

In addition to the primary importance of wetlands, the restoration of rivers and streams that are tributary to the Great Lakes is very significant. They provide the linkage between the lakes and the watersheds, and serve as a key passage to spawning areas for many fish. Islands in the Great Lakes basin also are of special significance because of the amount of shore land they have and the habitat they provide. Special care must be taken to preserve these areas. Urban centers in the basin have lost nearly all their natural habitat, so there must be a greater effort to preserve what is left, and restore what can be recovered.

Coastal Health

The top priority must be the management of wet weather discharges of untreated waste, but it is important to recognize that smaller programs can be very effective in dealing with some of the problems in coastal areas. Specifically, beach related restoration activities and reducing contamination from indirect sources can yield significant results with relatively low expenditures. It is also essential that EPA devise a credible national standard for compliance monitoring, combining microbial assessment and standardized sanitary surveys, including a real-time test method such that monitoring authorities are able to identify local contamination sources and beach patrons can know the current status of the water quality and are informed of exposure risks with respect to recreational activities.

Areas of Concern

To elaborate on the points made above, the coordination, management, and accountability for Great Lakes cleanup of AOCs need significant strengthening. EPA needs a strong manager whose sole job is overseeing the work on the 31 U.S. areas of concern, with sufficient staff dedicated to working on all of those sites. Likewise, each state needs sufficient management and staff dedicated to this effort. At the local level, each city should have at least one person assigned to the AOC, and that person needs access to the mayor of the city. Cities should also be given more authority in the AOC process. If a tribe has an AOC on their lands, it needs a person with access to the tribal chair assigned. These levels of government need to coordinate their efforts with each other on at least a weekly basis, and there must be special emphasis on coordinating with other agencies within each of those levels. It is essential that there be a high level of accountability, with at least quarterly progress reporting and changes in resources, approaches, or personnel if schedules are not being met. The levels of government need to provide funding to make this happen, or priorities need to be reexamined to reprogram funds and

people from other areas to working on AOCs. The U.S. should look to Canada for different models of AOC management as there are already two restored AOCs and others approaching that status. For reference, the list of the Areas of Concern are included as Attachment A. One of the recommendations also highlights the need to develop clean treatment and destruction technologies and better disposal options, and this is especially important in dealing with toxic pollutants.

Toxic Pollutants

Although the Cities Initiative did not identify this strategy team area as a top priority, it is still very important. Part of the toxic problem will be addressed by the work on AOCs and on wet weather flows, and with continued work under the Binational Strategy for reducing toxics. The Binational Strategy should be given more emphasis in the action plan, as it has been very successful to date. In addition, there should be a commitment to more aggressive mercury reductions on a more ambitious timetable to protect the lakes from this pollutant.

Indicators and Information

Information is critical to the effort to protect and restore the Great Lakes. Before additional expenditures are made on collecting more, there must be a much better job of managing existing efforts to collect, analyze, store, and interpret data. For starters, there needs to be a single organization designated as the authority for data and information. They would lead, direct, and coordinate the work of all the other agencies involved in the effort, and would establish the appropriate strategies, hardware and software needs, coordinating mechanisms, and other elements of a strong information network. In addition, this authority would establish the top ten indicators on the Great Lakes and make sure that the necessary data were collected and reported to managers and the public in a way that would let people really know if the Great Lakes are getting cleaner.

Sustainable Development

There are many good ideas in this section of the action plan, but implementation will take a long time and be very difficult. It would help if there were a more focused effort that could show some short term results. This is the basis for the Cities Initiative suggestion that there be a focus on waterfront revitalization in urban areas. The potential for tremendous success is there, and if action is not taken now, we could be living with mistakes for the next 100 years. Federal, state, local, and tribal funding is critical, but close cooperation with the private and non-profit sectors is also essential. Best practices from around the basin can be shared. Success in this area could bring many economic and social benefits to people all across the lakes, as well as environmental improvement, and could help highlight the quality of life this region of the country has to offer.

Future Actions

The work of the GLRC cannot stop with the release of this action plan. The primary failure of past plans has been the lack of commitment to implementation. The first future action that GLRC must commit to is the continuation of its efforts to assure implementation. The GLRC Executive Committee and its staff must track and report progress on a continuing basis, and recommend and take corrective action where progress is inadequate. As part of implementation, it will be important to establish lead and supporting organizations to help assure accountability and to also have a legislative strategy.

Another area where there was not an opportunity to focus attention during the development of the action plan was the institutional framework for the Great Lakes. This framework has developed over the past one hundred years, starting with the creation of the International Joint Commission in 1909. Many institutions have been added over the years, as well as hundreds of authorities and programs. At the same time, no one is in charge to manage the work or to establish accountability for progress. A special commission needs to examine this situation and come up with recommendations within a nine month period for a well defined management structure that is fully integrated with Canadian counterparts. One option that should be considered is a position and small staff funded jointly by the federal, state, provincial tribal, and local governments which would have a strong leadership role over all programs and agencies on the lakes, and would report to a board with government and other stakeholder representation.

Finally, climate change is unfolding before our eyes, and we are not doing enough about it. The effects on the Great Lakes ecosystem from heat waves, droughts, less frequent but more intense precipitation, and many other phenomena are already significant. Lower lake levels, more sewer overflows, higher water temperatures, and many other effects are already being observed. The Great Lakes basin communities, industries, agriculture, and other sectors need to take a leadership role nationally to deal with the growing seriousness of the problem across many fronts, especially those dealing with energy generation and consumption, and the resulting emissions.

ATTACHMENT A

