



August 19, 2009

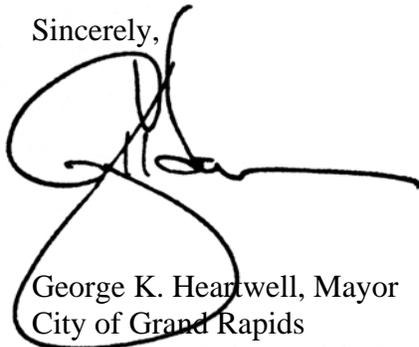
Mr. Anthony Kizlauskas
77 West Jackson Blvd
Chicago, IL 60604

Dear Mr. Kizlauskas:

I am pleased to submit the enclosed comments from the Great Lakes and St. Lawrence Cities Initiative regarding the Great Lakes Restoration Initiative. As a coalition of 66 U.S. and Canadian mayors working to advance the protection and restoration of the Great Lakes and St. Lawrence River, we appreciate the opportunity to weigh in on the development of the Great Lakes Restoration Initiative multi-year plan.

If you have any questions about the enclosed comments, please contact our Executive Director, David Ullrich, at 312-201-4516 or david.ullrich@glslcities.org. On behalf of the Cities Initiative, we look forward to working with our federal government partners to move forward on the very important work of protecting and restoring the Great Lakes and St. Lawrence River.

Sincerely,



George K. Heartwell, Mayor
City of Grand Rapids
Chair, Great Lakes and St. Lawrence Cities Initiative

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David Miller, Mayor of Toronto, Founding Canadian Chair



Great Lakes and St. Lawrence Cities Initiative Comments on the Great Lakes Restoration Initiative – August 19, 2009

Introduction:

The Great Lakes and St. Lawrence Cities Initiative is a binational coalition of mayors and local elected officials that works actively with federal, state, provincial, tribal and first nation governments to advance the protection and restoration of the Great Lakes and St. Lawrence River. We currently have 66 member municipalities of all sizes from across the Basin.

Mayors of the Cities Initiative are a prominent voice in efforts to protect and restore the vitality of the Great Lakes and St. Lawrence River and improve the quality of life for the residents of the region. Through an integrated approach to environmental, social and economic agendas within their communities, Canadian and U.S. mayors of the Cities Initiative are leading a movement that will sustain our freshwater resources long into the future.

Through the Cities Initiative, mayors are acting upon a number of important issues regarding the Lakes and River. The renegotiation of the Great Lakes Water Quality Agreement, the negotiation of the Canada Ontario Agreement, the Great Lakes Restoration Initiative, the Great Lakes Regional Collaboration, and the St. Lawrence Action Plan are just a few of the key policy arenas within which the Cities Initiative is working to ensure the municipal voice is represented. Additionally the Cities Initiative has a number of efforts underway that highlight and further encourage action on the local level to protect and restore the Lakes and River, including projects on beach health, the proper disposal of pharmaceuticals and personal care products and water conservation.

GLRI and the funding process:

The Cities Initiative is encouraged by President Obama's proposed Great Lakes Restoration Initiative (GLRI) and hopes that Congress will appropriate the \$475 million for the first year of the Initiative and appropriates at least that amount in subsequent years. Local governments are eager and ready to begin restoration projects under the GLRI. The Cities Initiative fully expects that local government will be eligible for most, if not all, of the competitive grants and project agreements that are made available.

It is critical that the competitive grant process be as efficient and user-friendly as possible. The goal should be to get the maximum amount of funding on the ground quickly so that projects can begin. Transaction and administrative costs during the grant

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application and dispersal processes should be kept to a minimum, while ensuring that only quality projects are funded and that accountability is maintained.

In order for restoration projects to start promptly, the Cities Initiative encourages US EPA and the federal government to eliminate or significantly reduce the necessary local and state matching funds for projects under the GLRI. The Cities Initiative recognizes the importance of demonstrating progress under the GLRI and we anticipate that local and state match requirements could hinder the start of GLRI projects.

GLRI and the focus areas:

The nearshore health focus area is of particular interest to the Cities Initiative given the significance of clean, safe and swimmable beaches to many Great Lakes communities. The Cities Initiative anticipates that through the GLRI, nearshore work will move beyond conducting sanitary surveys at beaches to remediating sources of contamination.

Aquatic invasive species continue to be a significant threat to the Great Lakes. Through the Great Lakes Regional Collaboration AIS Rapid Response effort the region got a start on developing rapid response protocols. GLRI funding could support further development and refinement of these necessary protocols, as well as projects to close off introductory pathways for invasive species.

The legacy of toxics and contaminated sediment has lingered long enough in the Great Lakes. The GLRI provides an opportunity to make some real progress on these issues and on cleaning up Areas of Concern. The Cities Initiative encourages the federal agencies to focus on addressing contaminated sediments in the Lakes as well as habitat restoration at Areas of Concern with GLRI funding. To ensure the legacy of toxics and contaminated sediments does not continue, the GLRI should provide ample support to e-waste, household hazardous waste and pharmaceuticals and personal care products collection and disposal programs.

Habitat and wildlife protection is critical to ensuring the health and vitality of the Great Lakes and the region. Urban habitats are often overlooked for funding for restoration work, but are still significant and integral to the ecosystem in many ways. The Cities Initiative trusts that urban habitats will be considered for GLRI funding in order to further protect and restore wildlife and habitats critical to the Great Lakes.

Accountability, monitoring, evaluation, communication and partnerships are all important to the work of protecting and restoring the Great Lakes. The Cities Initiative views this focus area as an opportunity for local Area of Concern groups. These groups, often comprised of citizen volunteers, don't always have the resources or capacity they need to

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make progress on their AOC. The Cities Initiative would like to see GLRI funding for local AOC groups to help build capacity as needed so the good work of cleaning up and restoring AOCs can move forward. Where appropriate, a local governmental unit should be considered as a potential recipient of such grants.

Conclusion:

The Cities Initiative appreciates the opportunity to provide comments on the GLRI multi-year plan. Along with our federal, state, and tribal government partners, and the stakeholders of the region, we hope that Congress will appropriate the \$475 million for FY 2010 and funding for the multi-year plan. Local government is making considerable progress on Great Lakes protection and restoration and is eager to move forward on projects through the GLRI. The Cities Initiative looks forward to working with the federal government to develop the multi-year plan so that we can further advance the protection and restoration of the Great Lakes.