

## **Current Thoughts Regarding GLAB Charge Question #2**

**July 23, 2013**

The following is a summary of the discussions of the Charge Question #2 Work Group but does NOT reflect a consensus opinion. Rather, it should be viewed as a working Document prepared for the 7/23/2013 GLAB Meeting. Additional discussion will be required before forwarding a consensus opinion.

Overall comments.

- 1) The need will exceed the funding so priority should be given to “on the ground” restoration projects and to those project that fall outside of traditional permitting/enforcement arena.
- 2) GLRI funds should not be used to subsidize other important (but often underfunded) environmental programs at the State and Local level.
- 3) Projects that have leveraged Non-GLRI funding, cost effective reductions/remediation, AND have put in place all existing federal drivers (i.e. TMDLs, Permits, and Numerical Limits) should be given priority.
- 4) The GLRI should encourage the use of innovative technologies (eg. microbial source tracking) but should leave the acceptance/approval of that technology to the States and/or existing federal programs (not funded by GLRI).
- 5) The GLRI funds should target remediation of legacy problems and the prevention of “new legacy problems” (notable Asian Carp and Phosphorous Loads to the Great Lakes).

### ***Charge Question 2:***

- ***In FY13, the federal agencies emphasized investments on three “priority” subjects: (1) expediting AOC cleanups, (2) reducing nutrients in priority watersheds, and (3) preventing the establishment of invasive species, particularly Asian carp. Should we keep or modify these three priorities?***

1. Federal Agencies should give priority to projects that expedite AOC cleanups. However, projects within these AOC that are unable to be addressed within the existing regulatory/enforcement arena should receive higher priority (e.g. diverting funds for programs like illicit discharge elimination programs, while cost effective and compelling, should remain the purview of the State permitting/enforcement programs).
2. Federal Agency should give priority to reducing nutrient loads throughout the Great Lakes giving special priority to the: 1) Maumee River/Western Lake Erie (including Lake St. Clair and the interconnecting channels), 2) Lower Fox River/Green Bay, and 3) Saginaw River/Bay.
3. Federal Agencies should give priority to preventing the establishment of Asian Carp in the Great Lakes through the use of GLRI funds. Federal Agencies should also continue to focus on preventing the vectors of other invasive species using other regulatory strategies and/or programs without the use of GLRI funding.

4. The GLRI should dedicate 75% of future funding on “in the ground” projects targeting the three “priority” subjects
  5. New invasive species associated with ballast water may need special consideration.
- ***If we keep the current priority to expedite AOC cleanups, should we continue to balance our investments in efforts to so that we are completing all management actions to take some AOCs off the cleanup list soon while continuing to invest in AOCs that may not be taken off the cleanup list for several years?***
    1. Projects that can delist an AOC should be given top priority. Keeping in mind that the documentation of how and when the delisting will occur needs to be part of the assessment.
    2. Projects that can eliminate a BUI should be given secondary priority (again if given priority clear documentation needs to be included).
    3. Projects that can show documented progress to delisting an AOC should be given tertiary priority.
    4. Projects to be funded should include AOC projects with some spatial distribution across the Great Lakes Basin.
    5. Projects outside of AOCs can be funded if determined to be sufficiently important by the Assistant Administrator.
  - ***The federal agencies have targeted three priority watersheds for accelerated nutrient reduction work: (1) Maumee River/Western Lake Erie, (2) Lower Fox River/Green Bay, (3) Saginaw River/Bay watersheds. If we keep the current priority to reduce nutrients in priority, should we also continue to focus conservation activities to have a stronger impact in some sub-watersheds of these three priority watersheds? Or should we disperse our conservation activities so they may have a wider geographical impact throughout the three priority watersheds (but potentially weaker impact across sub-watersheds)? How can we improve participation of key landowners in conservation programs in these watersheds?***
    1. The GLRI should support permanent sustainable projects in Saginaw Bay, Western Lake Erie basin, Green Bay that emphasize near shore health and nonpoint source pollution prevention to reduce phosphorus runoff. Sustainable solutions include projects that include a plan for long term repair and replacement (as was required by the construction grants program). Assessment of the non-point sources should be included to bring specificity to the projects.
    2. The GLRI should give additional emphasis for funding projects within sub-watersheds of Maumee/Western Lake Erie, Lower Fox, Saginaw River/ Bay watersheds that have highest phosphorus and sediment loading. Additional funding emphasis should be targeted towards projects which are permanent and will not have to be continually funded in the future. Non-point sources should be addressed specifically and approaches for control associated with wet weather should be targeted.
    3. The GLRI will give high priority to funding projects in communities where policies and ordinances are developed to install, inspect, monitor and report progress on Nutrient Management Plan implementation and compliance that will become a permanent local process. (NRCS 590 provisions include waterways, concentrated flow channels, buffer strip installation, fertilizer and manure

spreading rates and cropping systems). Approaches to control wet weather inputs of nutrients, sediments and bacteria should be included.

4. When determining funding levels between the targeted watersheds, priority should be given to watershed that are effectively using all available tools including having an approved TMDL and/or numerical criteria for nutrients.
  5. The USEPA and their Federal Partners should work together to establish a method (preferably inclusion in the USDA Farm Bill) to require agricultural producers who benefit from commodity programs and/or insurance subsidy programs to comply with all provisions of NRCS 590 nutrient plan including regular inspection certification of the 590 implementation.
  6. Projects that eliminate large phosphorous loading anywhere in the Great Lakes should be eligible for GLRI funding but at a lower priority than that of the priority watersheds.
- ***If we keep the current priority to prevent invasive species from becoming established, should we target our GLRI investments at a few specific species? Or should we address other invasive species, too, and if so, which ones? How do we strike the right balance between investing in the control of invasive species already in the Great Lakes and preventing new invasive species from entering them?***
    1. Funding for the prevention of Asian Carp should remain a priority.
    2. Funding for control of other invasive species should retain lower priority.
    3. The GLAB recommends that Ballast Water regulations and enforcement continue to strengthen and remain focused on the prevention of invasive species introduction.