

Great Lakes Advisory Board (GLAB) Charge Questions

Introduction

EPA, as the chair of the Great Lakes Regional Working Group, is providing these charge questions to the Great Lakes Advisory Board (GLAB) to inform the development of the Great Lakes Restoration Initiative (GLRI) Action Plan IV (APIV). GLRI APIV will cover fiscal years (FY) 2025 to 2029.

Charge Questions

- 1) **Public Engagement on GLRI APIV:** What does the Board recommend to ensure *effective* and *representative* public input into the development of GLRI APIV?
 - (A) Should EPA and the RWG use a similar format of engagement as was done for GLRI APIII?
 - (B) What specific steps could be taken to ensure we provide meaningful engagement with disadvantaged communities?
 - (C) What groups and organizations could help EPA and the RWG conduct meaningful engagement with disadvantaged communities?
 - (D) Many disadvantaged communities have already shared their priorities and perspectives to EPA and other agencies on a variety of environmental topics. How can we effectively incorporate and leverage this previous input?
 - (E) There is a likely a lack of familiarity with the GLRI in many disadvantaged communities. What information and/or materials could be developed and shared beforehand to facilitate meaningful engagement?

Background information:

In 2018, EPA and the RWG convened a series of six listening sessions to solicit input on the GLRI Action Plan III (APIII) and allowed direct and high-level interaction between members of the public and federal, state, and tribal subject matter experts. The sessions were held in Toledo, OH; Rochester, NY; Duluth, MN; Milwaukee, WI, Saginaw, MI, and Chicago, IL. During each session, EPA provided a public-friendly summary of the GLRI, encouraged questions, and solicited input on priorities to be used in the development of GLRI APIII.

Over 550 Great Lakes stakeholders participated in the sessions, with additional feedback provided through more than 250 written responses. Participants included representatives from agriculture, industry, tribes, states, academia, local government, non-profits, metropolitan planning organizations, and the public. While the overall participation in these sessions was good, EPA and the RWG believes more can be done to engage with the public, especially in disadvantaged communities.

Several improvements were made to GLRI APIII because of this input and the input from Tribes, States, and the GLAB. For example, a new objective was added to Focus Area 3: Nonpoint Source Pollution and Impacts on Nearshore Health. This new objective is focused on the use of adaptive management to improve the effectiveness of management efforts. In addition, the objectives, commitments, and measures of progress in Focus Area 4: Habitat and Species were streamlined to improve coordination across focus areas (primarily invasive species) and enhance reporting. Focus Area 4 also added a new measure that targets priority species with a target of completing action to significantly protect or promote the recovery of selected species populations.

In the Final Report to EPA, dated April 6, 2022, the GLAB notes “While the GLRI benefits from a skilled and passionate community of professionals and advocates, it can be somewhat lacking in diverse perspectives and engagement.” The GLAB also notes the following in this final report: “Moreover, GLRI outreach must convene stakeholders in environmental justice communities and engage them in an assessment of environmental and climate response needs to improve their awareness of and engagement in GLRI initiatives, including Lakewide Action and Management Plans.” One of the GLAB’s near-term recommendations related to outreach and education was “Establish a framework and programs for engaging and supporting the relevant activities of community organizations, libraries, and nontraditional stakeholders, particularly those in disproportionately impacted areas, through meaningful engagement and communication.” Another near-term recommendation of the GLAB is to “Engage the public early in the development of the GLRI Action Plan IV, and prioritize community outreach and engagement with communities of color, Indigenous communities, and low-income communities.”

- 2) **Diversity, Equity, Inclusion and Justice in GLRI APIV** – In the response to the previous set of charge questions, the GLAB made multiple references to include environmental justice into GLRI APIV. The GLAB provided some general examples about how environmental justice and/or diversity, equity, inclusion and justice could be considered into the implementation of the GLRI and future Action Plans. However, EPA and the RWG would like the GLAB’s input on specific examples of how EJ could be best incorporated into GLRI APIV, especially given the level of detail of previous action plans. Please use GLRI APIII as a template when providing recommendations. For example, does the GRLI APIV include a brief description of Justice40 (and its relationship to GLRI) in the introduction and then reference how ongoing and future work will consider opportunities to benefit disadvantaged communities? Or should additional commitments and measures of progress be considered?

Background information:

EPA defines environmental justice as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. This goal will be achieved when everyone enjoys:

- The same degree of protection from environmental and health hazards, and
- Equal access to the decision-making process to have a healthy environment in which to live, learn, and work.

One of EPA’s top priorities is to advance environmental justice. This is repeated in agency-wide guidance, [EPA’s FY 2022 – FY 2026 Strategic Plan](#), and EPA’s [Equity Action Plan](#). These plans and guidance build from the Administration’s [Justice40](#) Initiative, a whole-of-government approach to deliver at least 40% of the benefits of certain federal programs to disadvantaged communities.

The only reference to “environmental justice” in GLRI APIII is on page 5: “Cleanup of Areas of Concern has led to community revitalization, which is especially important in environmental justice communities and opportunity zone.” While this may be the only reference, EPA and the RWG have taken many positive steps to advance environmental justice across the GLRI (not just in the AOC program). For example, (1) green infrastructure projects are being implemented in

disadvantaged communities; and (2) environmental education engagement opportunities are being targeted in disadvantaged communities.

In the Final Report to EPA, dated April 6, 2022, the GLAB urges GLNPO to identify more ways that GLRI current and future programs and partners can advance Justice40 implementation outcomes and increase equitable participation and benefits. Some of the GLAB's specific recommendation related to environmental justice and future Action Plans include:

- Incorporate Justice40 initiatives and priorities into the GLRI Action Plans and investments, and review environmental justice recommendations for environmental justice communities and tribes as pertinent to the Great Lakes.
- Engage the public early in the development of the Great Lakes Restoration Initiative Action Plan IV, and prioritize community outreach and engagement with communities of color, Indigenous communities, and low-income communities.
- Establish a broad set of project outcomes that include environmental justice, climate, and public health impacts.
- Update Action Plans to ensure environmental justice and climate change are included.
- Establish a broad set of project outcomes that include environmental justice, climate, and public health impacts.
- Engage the public early in the development of the Great Lakes Restoration Initiative Action Plan IV, and prioritize community outreach and engagement with communities of color, Indigenous communities, and low-income communities.
- Develop and implement community engagement metrics to assess progress toward environmental justice outcomes.
- Provide publicly accessible summaries of Great Lakes National Program Office reports to Congress that describe Great Lakes Restoration Initiative benefits and improvements to impacted communities regarding restoration, mitigation, communication, and education with special reports on Great Lakes Restoration Initiative improvements in environmental justice communities, tribes, and Indigenous communities.

- 3) **Climate resiliency in GLRI APIV** - In the response to the previous set of charge questions, the GLAB made multiple references to include climate change/resilience into GLRI APIV. The GLAB provided some general examples about how climate could be considered into the implementation of the GLRI and future Action Plans. However, EPA and the RWG would like the GLAB's input on specific examples of how climate could be best incorporated into GLRI APIV, especially given the level of detail of previous action plans. Please use APIII as a template when providing recommendations. For example, does the GRLI APIV include a brief description of climate change/resilience (and its relationship to GLRI) in the introduction and then reference how ongoing and future work will consider opportunities to enhance climate resilience of GLRI projects and the Lakes themselves? Or should additional commitments and measures of progress be considered?

EPA and the RWG are also interested in the Board's recommendations on how climate adaptation may be better incorporated into the GLRI's working definition of resilience (as currently described in Background Information).

Background information:

The GLRI APIII included an operating principle on "Project Sustainability" to guide GLRI

planning and implementation. The Project Sustainability principle stated: “The GLRI federal agencies will continue to encourage project plans and designs that are resilient to the effects of multiple stressors, including a changing climate, ecological change, invasive species, population pressures, and other variables. GLRI federal agencies will also encourage project stewardship to promote the sustainability and long-term benefits of projects.” The GLRI APIII’s working definition of resilience suggests the intent of maintaining existing conditions in the face of climate change and other stressors. This may be reasonable and attainable for some aspects of GLRI funded activities, e.g., designing infrastructure investments to withstand anticipated changes in water levels, drought, and episodic rainfall events, for example. However, not all restoration activities, such as restoring fish and wildlife resources and their habitats, can realistically maintain static conditions as many habitats and species are already responding to changing climate conditions. In these cases, approaches that facilitate adaptation to inevitable climate-induced changes may need to be incorporated into habitat and species restoration projects.

While this was the GLRI APIII’s only reference to climate change, EPA and the RWG have taken many positive steps to advance climate resilience across the GLRI. For example, through the GLRI, EPA continues to partner with federal, state, tribal, and local agencies, including the U.S. Army Corps of Engineers, to protect and restore coastal and nearshore habitats for purposes of ecological restoration and is committed to continuing to work collaboratively with these partners moving forward. Coastal wetland projects help make the shorelines more resilient to the effects of high lake levels. These projects can also provide economic and recreational benefits to local communities. Further, starting in 2020, GLRI funds are supporting a multi-year ~\$5M interagency study, led by the U.S. Army Corps of Engineers, to enable the planning, design and implementation of resilient and sustainable projects along the Great Lakes coast. The study will not only support GLRI but will also inform the appropriate design and placement of shoreline mitigation measures by others.

In the Final Report to EPA, dated April 6, 2022, the GLAB “there is still much room for improvement in the development of the next GLRI five-year Action Plan on climate change and climate resilience. Prior Action Plans have not fully recognized or addressed the grave threats posed by climate change and extreme weather events in the Great Lakes Basin. The next generation of Action Plans will have to do more to capture climate change impacts in weather conditions (such as precipitation and heat levels) and vulnerabilities they present to current GLRI focus areas and the growth of extreme challenges, including flooding, drought, and non-climate stressors such as deteriorating infrastructure.” The GLAB further notes “Great Lakes climate initiatives such as the U.S. Climate Resilience Toolkit and the Great lakes Climate Adaptation Network offer important community resilience information with attention to equity. These and similar projects could enhance the education, training, communication, and outreach objectives of the GLRI’s Action Plan IV.” Further, the GLAB notes “Education and training in these and other sustainable development practices and methodologies are important components taught by tribal colleges and governments and should be incorporated in the next GLRI Action Plans. These practices provide important bases of awareness and intersection with environmental concerns in disadvantaged communities of color and low-income areas, particularly in AOCs where the incorporation of climate resilience and climate change strategies are critical objectives.” The GLAB also notes “GLRI will be required to appreciate and approach these added challenges in order to mitigate harms and restore vitality to these communities.”

The GLAB also noted “Within the GLRI, Action Plan programs could provide critical insights and data for Great Lakes communities. Such initiatives could fall under the third GLRI Action Plan’s fifth Focus Area, "Foundations for Future Restoration Areas,” which aims to assess overall ecosystem health and the identification of significant remaining problems. The GLAB encourages prioritizing the implementation of climate change resiliency programs in AOC and nonpoint source pollution control projects for disadvantaged communities.”

Some of the GLAB’s specific recommendation related to environmental justice and future Action Plans include:

- Update Action Plans to ensure environmental justice and climate change are included.
- Incorporate the Biden Administration’s government-wide approach to climate change across the Great Lakes.
- Support the assessment of climate change on the Great Lakes Basin that affects environmental, public health, and economic metrics, including drought and flood resiliency and sustainability.
- Engage environmental economists to establish baseline data needs, ecosystem services metrics, evaluation, and milestones using both traditional ecological knowledge and scientific ecological knowledge.
- Support ongoing research & development so that stakeholders can get an earlier understanding of emerging challenges, e.g., climate change impacts that could affect the magnitude or longevity of restoration efforts.
- Establish a broad set of project outcomes that include environmental justice, climate, and public health impacts.