



August 19, 2009

The Honorable Lisa P. Jackson  
Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

JIM DOYLE  
CHAIR  
*Governor of Wisconsin*

Dear Administrator Jackson:

MITCH DANIELS  
*Governor of Indiana*

JENNIFER M. GRANHOLM  
*Governor of Michigan*

DAVID A. PATERSON  
*Governor of New York*

TIM PAWLENTY  
*Governor of Minnesota*

PAT QUINN  
*Governor of Illinois*

ED RENDELL  
*Governor of Pennsylvania*

TED STRICKLAND  
*Governor of Ohio*

On behalf of the Great Lakes Governors, thank you for the opportunity to provide comments on the proposed Great Lakes Restoration Initiative's (GLRI) Multi-Year Restoration Action Plan. As you know, the Council of Great Lakes Governors is a non-partisan partnership of Governors from each of the eight Great Lakes States--Illinois, Indiana, Michigan, Minnesota, New York, Ohio, Pennsylvania, and Wisconsin. Through the Council, the Governors work collaboratively to address the significant environmental and economic challenges facing our region. In this connection, we are eager to work together to make the GLRI a success.

In 2003, the Governors identified nine priorities for Great Lakes restoration and protection (see attached). Eight of these priorities served as the organizing framework for the Great Lakes Regional Collaboration's (GLRC) Strategy to Restore and Protect the Great Lakes (Strategy). The Governors worked with hundreds of stakeholders and produced this Strategy--a comprehensive, science-based restoration and protection plan. The Council of Great Lakes Governors has continued to coordinate the Governors' ongoing efforts to implement the Strategy.

President Obama has proposed \$475 million for the GLRI in fiscal year 2010. This proposal provides an unprecedented opportunity to address some of the Great Lakes Basin's most pressing needs by accelerating Strategy implementation. The GLRI will significantly increase the national investment in revitalizing our economy and protecting our Great Lakes.

While we appreciate that the GLRI represents a potential new model for providing funding for ecosystem protection and restoration through the USEPA, we are concerned about the complexities and transaction costs that could arise. USEPA will receive the GLRI funding and then redirect funds through dozens of federal agencies and programs. Further, it is expected that each of the federal agencies receiving GLRI funding from USEPA will retain some funding for its own purposes and then issue some number of competitive grants. Opportunities must be found to streamline this structure, minimize transaction costs and reduce bureaucracy. We are committed to

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working collaboratively with all partners to ensure that we maximize positive outcomes on the ground and in the water.

To be most successful, we must enact a multi-year plan that encompasses several overarching principles:

- Ensure that all funded activities help implement the GLRC's goals and recommendations. The Strategy remains the centerpiece for Great Lakes restoration and protection in the United States.
- Supplement – not supplant – funding for existing Great Lakes programs. We continue to want to ensure that existing and proven core programs, such as the Clean Water State Revolving Loan Fund; the Coastal Zone Management Program; and, the Great Lakes Fishery Commission's Sea Lamprey control program are fully funded. Continuing programs like these is critical to maintaining the gains made through past investments.
- Minimal bureaucracy, allowing efforts to be directed toward protection and restoration rather than toward process and paperwork. Application processes and requirements for reporting and accountability should be coordinated and streamlined. States need maximum flexibility to use funds in a manner that will achieve the desired impact.
- To the greatest extent possible, funding should be distributed via block grants or otherwise coordinated into large grants to States so that monies can be centrally managed and directed to the various agencies and entities receiving funding within the State. This approach will improve transparency and accountability, and help ensure that spending is consistent with the Strategy, State plans, Lakewide Management Plans, Remedial Action Plans and other planning efforts.
- Coordination of the efforts of the many government and non-governmental entities involved in protection and restoration activities. A collaborative structure including the Administration, Congress, Governors, Mayors and Tribal leaders in consultation with stakeholders should be centrally involved in informing budgeting, coordinating program delivery, oversight and reporting.
- Recognition of the leadership role of the Great Lakes Governors in defining State and regional priorities. At the request of Congress, the Governors identified nine priorities that have guided our collective efforts on Great Lakes restoration and protection. The Governors must continue to play a lead role in achieving these priorities.
- Adopt alternatives to non-federal match requirements, with the flexibility to recognize ongoing and significant investments by States, other governments and stakeholders in Great Lakes protection and restoration.

The Governors are eager to work in partnership with the Administration, Congress and other partners to develop joint proposals toward our shared goals—a successful GLRI and acceleration in our shared efforts to protect and restore the Great Lakes.

Thank you again for this opportunity to provide comments. Additional comments are forthcoming on behalf of the individual Great Lakes States including Wisconsin. If you have any questions, or would like to discuss these comments further, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Jim Doyle". The signature is written in a cursive, flowing style.

Jim Doyle  
Chair, Council of Great Lakes Governors  
Governor, State of Wisconsin

Attachment



October 1, 2003

The Honorable Michael DeWine  
140 Russell Senate Office Building  
Washington, D.C. 20510

BOB TAFT  
CHAIRMAN  
*Governor of Ohio*

ROD BLAGOJEVICH  
*Governor of Illinois*

JIM DOYLE  
*Governor of Wisconsin*

JENNIFER M. GRANHOLM  
*Governor of Michigan*

JOSEPH E. KERNAN  
*Governor of Indiana*

GEORGE E. PATAKI  
*Governor of New York*

TIM PAWLENTY  
*Governor of Minnesota*

ED RENDELL  
*Governor of Pennsylvania*

DAVID NAFTZGER  
*Acting Executive Director*

As the Governors of our nation's Great Lakes States, we would like to express our appreciation for the introduction of S.1398, "The Great Lakes Environmental Restoration Act" and H.R.2720, the "Great Lakes Restoration Financing Act." We recognize that despite the many federal, state and local efforts currently underway to restore and protect them, the Great Lakes remain at risk of damage from continuing pollution, environmental degradation and unsustainable water resource management practices. We applaud the bills' sponsors and cosponsors for acting to address these threats and are heartened by the potential for substantial additional federal dollars to abate them.

Two decades ago our States jointly formed the Council of Great Lakes Governors, in part to fulfill our lead responsibilities as stewards of the Great Lakes Basin's water resources and in recognition of the tremendous ecological, economic and social benefits they provide. The Great Lakes Governors remain committed to protecting and restoring the natural habitat and water quality of the Great Lakes Basin; preserving diverse and thriving plant and animal communities; protecting the water supply; and, safeguarding human health.

The Region's Governors have reached consensus that the following priorities should guide Great Lakes restoration and protection efforts:

- Ensure the sustainable use of our water resources while confirming that the States retain authority over water use and diversions of Great Lakes waters.
- Promote programs to protect human health against adverse effects of pollution in the Great Lakes ecosystem.
- Control pollution from diffuse sources into water, land and air.
- Continue to reduce the introduction of persistent bioaccumulative toxics into the Great Lakes ecosystem.
- Stop the introduction and spread of non-native aquatic invasive species.
- Enhance fish and wildlife by restoring and protecting coastal wetlands, fish and wildlife habitats.
- Restore to environmental health the Areas of Concern identified by the International Joint Commission as needing remediation.
- Standardize and enhance the methods by which information is collected, recorded and shared within the region.
- Adopt sustainable use practices that protect environmental resources and may enhance the recreational and commercial value of our Great Lakes.

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Last year, in response to the request of members of the Great Lakes Congressional Task Force and under the leadership of its Chairman, Governor Bob Taft, the Council launched the *Great Lakes Governors' Priorities Task Force*. The premise of the Task Force's work to date has been that coordinated planning is needed to achieve comprehensive restoration and protection of the Great Lakes while making efficient use of limited resources. Working with the Great Lakes Congressional delegation, Great Lakes Mayors, and stakeholders throughout the region, we believe a broad based plan can be constructed in the context of pending legislation, thus providing both a blueprint for restoration and protection and critically needed federal resources to implement it. This plan should build on the significant State and Federal investments to date, value broad public participation, foster sound public policy and sustainable behavior, and address the environmental issues of the present and anticipate the challenges of tomorrow so that the Great Lakes experience full restoration and protection, balanced with economic prosperity.

We will soon present to Congress detailed comments on S. 1398 and H.R. 2720. As the legislative process moves forward, the Great Lakes Governors encourage Congress to work toward enactment of a bill that encompasses these overarching principles:

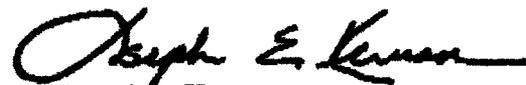
- minimal bureaucracy, allowing efforts to be directed toward protection and restoration rather than toward process and paperwork;
- affordable non-federal match requirements, particularly in light of ongoing and significant State investments in Great Lakes restoration;
- coordination of the efforts of the many government and non-governmental entities involved in protection and restoration activities; and,
- recognition of the leadership role of the Great Lakes Governors in defining regional priorities.

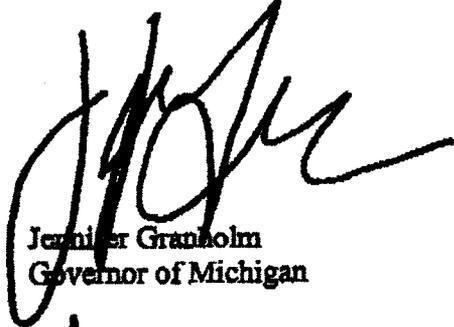
While the approach of the House and Senate bills is not identical, there are elements of these principles in each. The two bills are a similarly strong expression of Congressional intent to invest significant additional resources in Great Lakes protection and improvements, while seeking coordination throughout the region. We are also pleased to see both bills address the development of water quality indicators as a measure of progress.

In addition to detailed comments on the legislation, we plan to submit a short-term agenda to help guide spending decisions while a more comprehensive protection and restoration funding program is being developed. We believe it is vital to maintain the momentum of federal, state, and local governments, along with multiple stakeholder groups, on those projects and programs that are furthering our restoration goals today.

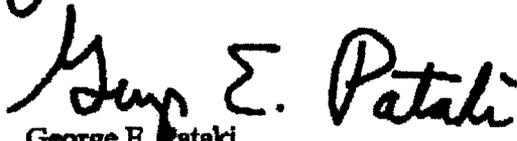
We welcome the opportunity to join you in building momentum for this historic advance in national support for the world's largest source of fresh surface water. We look forward to building on the partnership between the region's Governors and the Great Lakes Congressional Task Force to secure the protection and restoration of the Great Lakes ecosystem for generations to come.

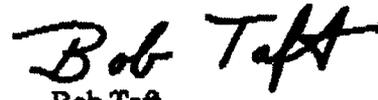
  
Rod Blagojevich  
Governor of Illinois

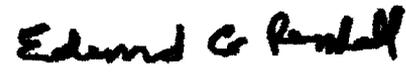
  
Joseph E. Kernan  
Governor of Indiana

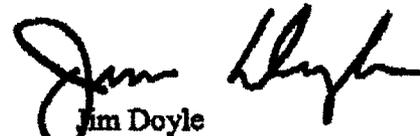
  
Jennifer Granholm  
Governor of Michigan

  
Tim Pawlenty  
Governor of Minnesota

  
George E. Pataki  
Governor of New York

  
Bob Taft  
Governor of Ohio

  
Edward Rendell  
Governor of Pennsylvania

  
Jim Doyle  
Governor of Wisconsin