

GREAT LAKES BUSINESS NETWORK

Great Lakes Business Network
213 W Liberty #200
Ann Arbor, MI 48104

August 1, 2023

The Honorable Michael Regan
Administrator, Environmental Protection Agency
Chair, Federal Great Lakes Interagency Task Force
Washington, DC 20004

Dear Administrator Regan:

We are writing as Great Lakes businesses to provide recommendations for Action Plan IV, as part of the Great Lakes Business Network (GLBN).

The GLBN is a coalition of more than 200 business leaders from across the Great Lakes region who advocate for thriving ecosystems, economies, and communities in the Great Lakes region. GLBN member businesses represent many industries, including: hospitality, retail, outfitters and outdoor recreation, farms and vineyards, manufacturing, brewing, transportation, art and photography, and more. GLBN businesses range from sole proprietor owned and operated to large companies with a national reach, and collectively sustain over 10,000 jobs in the Great Lakes region.

Since 2017, the Great Lakes Business Network has engaged members in addressing some of the most pressing threats to the Great Lakes, including the Line 5 pipeline, harmful algal blooms in Lake Erie, and climate change. The health of the Great Lakes is integral to businesses in the region; we rely on the lakes for drinking water, outdoor recreation, and supporting a robust tourism economy.

In addition to meeting the restoration needs of the region, we believe that the next Action Plan should also include a stronger focus on equity and climate change. To achieve this, we recommend the following overarching priorities:

- Strengthening the capacity of historically-underserved communities in decision making, collaboratives, workforce development, job training, and other resilience efforts;
- Investing in tools for projects in communities most impacted by pollution and environmental harm (e.g., EPA's Environmental Justice Screening Tool, Traditional Ecological Knowledge, nature-based coastal resilience support tools).
- Advancing adaptive projects that will keep up the momentum for public, economic, and ecological health.
- Commit to intervention strategies with existing activities and proposed projects to mitigate risk from fossil fuel infrastructure, microplastics, and other hazardous pollutants that threaten the health of past and future investments, as well as the overall health of the Great Lakes.



We have also included a detailed recommendation spreadsheet developed in partnership with the Healing Our Water Coalition to support our recommendations.

More specifically, we recommend the following for each of the focus areas:

Focus Area 1: Toxic Substances and Areas of Concern

- The proposed changes to this focus area center on strengthening equity in achieving the cleanup of AOCs and the protection of public health from toxic pollution. The changes will accomplish this in two ways: facilitating broader input in the Public Advisory Councils (PACs) that oversee the cleanup of the AOCs, and by incorporating the use of Traditional Ecological Knowledge.

Focus Area 2: Invasive Species

- The proposed changes strengthen the GLRI's prevention efforts and equity measures through the recognition and incorporation of Traditional Ecological Knowledge and through more direct and specific language in the Measures of Progress.

Focus Area 3: Nonpoint Source Pollution Impacts on Nearshore Health

- This area centers on preventing and managing nutrient runoff, the main driver of Harmful Algal Blooms (HABs). The proposed changes seek new tools and include a new Objective 3.4: Support innovative coastal approaches, which will support more collaboration between different agencies working in the same geographies and encourage EPA to integrate new projects with existing coastal management efforts
- Changes will support upstream (rural) and downstream (urban) collaboratives as a way to solve problems—particularly agricultural runoff—on a watershed scale. This builds on innovative approaches to harness resources for upstream pollution prevention.
- Additional recommendations link flooding to polluted runoff and look to harness the power of the Farm Bill—which pays farmers to take specific actions to improve soil and water quality—to maximize progress.
 - This recommendation specifically emphasizes the need for performance-driven solutions and increased monitoring to make sure investments are generating water quality outcomes and targeting areas with the biggest contributions to nutrient runoff loads.

Focus Area 4: Habitat Restoration and Native Species

- This focus area is intended to strengthen the biodiversity of the region by building more resilient habitat that intentionally includes Tribes and parties historically left out of these plans and decisions.
- Two new Objectives are being proposed:

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- 4.3 Support habitat restoration and protection in and around historically underserved communities; and
- 4.4 Support self-sustaining native fisheries.

Focus Area 5: Foundations for Future Restoration Actions

- This focus area needs to more explicitly address climate change and equity, by focusing research, education, and science to advance specific outcomes.

Thank you for considering these recommendations. It is critical that we incorporate these changes to ensure the freshwater resources that businesses and communities rely on are protected for years to come.

Sincerely,

The Undersigned Members of the Great Lakes Business Network

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