



July 13, 2026

The Honorable Russell Vought
Director, Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Re: OMB-2026-0034, Office of Management and Budget (OMB) Regulation for Federal Financial Assistance

Dear Director Vought:

Our groups work together to restore and protect the Great Lakes and region and the millions who depend on them. We oppose the proposed changes to the set of rules governing federal grants, cooperative agreements, and other federal financial assistance, commonly known as the "Uniform Guidance." Most significantly, the May 29 proposal makes changes that make it easier for agencies to screen federal funding based on subjective changes to administrative policy rather than statutory obligations. We ask the Office of Management and Budget to withdraw it without delay.

For the past year we have been increasingly concerned with the administration's pressure on federal programs and staff. Huge topline budget cuts and arbitrary firings and agency reorganizations have already left programs without adequate support. The dramatic changes proposed to federal financial assistance now lock in that confusion from federal agencies to other governmental and non-governmental partners essential for achieving our goals.

The federal government is an essential partner in our shared endeavor to help heal the lakes. Our region has undertaken one of the world's largest freshwater ecosystem restoration projects through the Great Lakes Restoration Initiative. Non-governmental groups, universities, industries, businesses, cities, tribes, and states forged partnerships to clean up toxic hot spots, restore fish and wildlife habitat, and combat invasive species. The challenges we face as a region will only get worse as federal cuts hamstring communities from doing good work. The price we pay to address these threats will only rise unless we reduce barriers for participation rather than increase them.

Additionally, the region's current restoration efforts are effectively allowing federal agencies to obligate their GLRI funds quickly to on-the-ground and in-the-water work. The Environmental Protection Agency, working with other federal agencies like the Army Corps of Engineers, U.S. Fish and Wildlife Service, U.S. Geological Survey, National Oceanic and Atmospheric Administration, Natural Resource Conservation Service, and the National Park Service, quickly convert the funding they receive to supplement restoration activities through existing, congressionally authorized programs. This structure allows for funds to move quickly from EPA

through the interagency agreements EPA reaches with other federal agencies and onto the ground to complete important restoration work. This model also ensures accountability and helps accelerate progress, avoiding potential duplication, all of which help save taxpayers money while focusing efforts on the highest consensus-based priorities.

The work we are doing in the region through this model is improving the lives of millions of people, and work is underway or completed on more than 8,871 restoration projects throughout the region. These projects, many of which supported by grants, cooperative agreements, or other federal awards, are benefiting communities, strengthening their resilience, and cleaning up the source of drinking water for more than 30 million Americans. Further the Great Lakes support a \$7 billion annual fishing industry that sustains 75,000 jobs. Great Lakes recreation attracts and engages millions of tourists generating as much as \$15 billion annually, thereby boosting economies of shoreline communities. The success of the Great Lakes investments is clear, as outlined by the following results:

- 7 Areas of Concern (AOC), the most toxic hotspots in the region have been delisted – Muskegon Lake, MI; Presque Isle, PA; Deer Lake, MI; White Lake, MI; Lower Menominee River, MI & WI; Ashtabula River, OH; Rochester Embayment, NY. Management actions to delist 9 additional AOCs have been completed.
- 123 beneficial use impairments (BUIs), a benchmark of environmental damage that characterize AOCs, have been addressed in Illinois, Indiana, Michigan, Minnesota, New York, Ohio, Pennsylvania, and Wisconsin under the GLRI.
- Vital support for early detection, monitoring, and regional response to address the threat of new and existing aquatic invasive species, including invasive carp, has been provided. Invasive species control activities have been implemented on more than 303,000 acres in coordinated efforts with federal, state, and local partners.
- Over 2.15 million farmland acres in priority watersheds have received technical and financial support, in partnership with other programs, to implement nutrient management actions. Conservation efforts across the Great Lakes have resulted in a projected reduction of 2.8 million pounds of phosphorus runoff, a major contributor to toxic algal blooms.
- 8,170 river miles have been cleared of dams and barriers resulting in fish swimming into stretches of river where they have been absent for decades and increasing biodiversity and water quality overall.
- Habitat and wildlife connectivity continue to improve as the Fish and Wildlife Service, National Park Service, Natural Resources Conservation Service, and National Oceanic and Atmospheric Administration worked with partners to restore, protect, or enhance nearly 530,000 acres of habitat, including 72,000 acres of coastal wetlands.

Moreover, investments in Great Lakes restoration create jobs and lead to long-term economic benefits for the Great Lakes states and the country. A 2018 assessment estimated that for every \$1 the GLRI invested through 2016 to clean up toxic hot spots in Areas of Concern (AOC), control invasive species, restore wildlife habitat, protect wetlands, and reduce toxic algal blooms more than \$3 in additional economic activity regionwide will be produced through 2036. The GLRI is revitalizing our waterfronts and leading a resurgence in water-based outdoor recreation and increasing tourism across the region.

To maintain these results, many of our groups have repeatedly called on federal agencies to continue prioritizing on-the-ground and in-the-water work, balance restoration with research and monitoring and adopt watershed-based and geographic priorities. The Healing Our Waters-Great Lakes Coalition has also repeatedly written to EPA urging it and other federal agencies to keep encouraging collaboration and partnerships, simplify grant administration and reduction of barriers, and increase transparency and stakeholder engagement. Lastly, the coalition has repeatedly called for a focus on measurable results.¹

Although OMB claims it is attempting to reduce administrative burden and increase oversight through the current proposal, this regulation creates financial risk and instability for the region's states, Tribes, cities, and non-governmental groups. Many non-federal stakeholders may be unable to accept increased financial and legal risks this regulation imposes blocking them from participating in the region's restoration and protection work.

Our concerns include:

§ 200.202 Program Planning and Design. This section focuses on how federal agencies design grant programs before issuing notices of funding opportunities. While we appreciate the focus on measurable restoration outcomes, creating clear goals and objectives, and interagency coordination, we are concerned with the elevation of requirements to review program design against administrative policy priorities and creation of a national interest review. Our region's Great Lakes priorities already align to reflect stakeholder engagement, ecosystem outcomes, and congressional requirements. Additionally, the region has well-established metrics of progress, which guide program management and budget decisions each year. Adding new programmatic requirements tied to shifting policy priorities and broad concepts like national interest--interpretations of which can easily shift between administrations and may become misaligned with statutory responsibilities--creates uncertainty for non-federal grantees depending on future implementation.

§ 200.205 Federal agency merit review of proposals. In addition to adding criteria at the program design stage (200.202), the proposal also adds a layer of review by political appointees to ensure consistency with the President's priorities at the award stage. Additionally, the changes proposed make merit and science-based peer review recommendations advisory. The proposal also leaves terms like 'national interest,' 'anti-American values,' and 'gold standard science' undefined. The region's Great Lakes efforts have long had congressionally authorized and funded priorities such as clean up Areas of Concern, controlling invasive species, and restoring habitat. The changes proposed seem to insert a new requirement to compare grants with the administration's priorities while diminishing the certainty that scientific and other merit-based criteria play in making decisions. Depending on implementation, the impact of these changes could be less consistency with statutory requirements, increased risk of arbitrary application of changing administration priorities, and less merit-based decisions with more emphasis on political criteria.

¹ Healing Our Waters-Great Lakes Coalition letter to Cameron Davis and Gary Gulezian, August 30, 2010; Healing Our Waters-Great Lakes Coalition letter to Cameron Davis and Susan Hedman, August 8, 2011; Healing Our Waters-Great Lakes Coalition letter to Lisa Jackson, November 15, 2012.

§ 200.206 Applicant Risk Assessments. The proposal amends applicant screening to include broad terms like “questionable practices” that may not be illegal or vague, undefined criteria when evaluating group affiliations. Great Lakes groups have a strong track record of producing results under existing rules. Many Great Lakes restoration projects are undertaken by counties, cities, conservation districts, Tribes and watershed organizations. Great Lakes groups ask for increased transparency and reduced administrative burden. Undefined assessment criteria obscures decisions and could disproportionately impact smaller groups with limited grant management infrastructure. (See also §§200.208 and 200.332)

§ 200.208 New Terms and Conditions. This section expands the scope of circumstances that can trigger when federal agencies add or change conditions to a grant award during its performance. The rule’s new emphasis on agency priorities, national policy changes, or national interest requirements (§ 200.202) pushes requirements past well-established grants management practices. This adds new uncertainty for grantees who would not know when grant terms might change if determined to not be consistent with administration priorities or policies. Maintaining high standards for grant management is something Great Lakes groups support. We have previously called for reforms to make it easier for groups to apply and manage federal funds by streamlining grant applications, reducing paperwork requirements, and making proposal evaluation clearer. However, allowing new conditions in the middle of a project could create enough uncertainty that groups (especially smaller organizations) may be unwilling to take on the additional risk.

§ 200.332 Requirements for pass-through entities. This section establishes the responsibilities of pass-through entities when they provide funding to subrecipients. This section is particularly important to Great Lakes restoration because many recipients of Great Lakes restoration such as interstate commissions, universities, and nonprofits pass funds to local partners. The proposal increases the responsibility of primary recipients of federal funds to conduct due diligence on partners, monitor performance, track outcomes, and ensure compliance. While we agree use of federal funds should be subject to accountability measures, there are already adequate grant management practices in place. Additional measures such as those in the proposal would add additional burdens without obtaining any additional protection. We are concerned that the additional burdens will cause fewer states, tribes, universities or nonprofits to take on restoration work that includes partnerships or subawards.

§ 200.340 Termination and suspension. This section addresses the ability of agencies to terminate or suspend awards in part or in whole for noncompliance for discretionary reasons. Current guidance already allows grants to be terminated if awards no longer achieve the programs goals or agencies priorities. Expanding this to include national interest and allowing termination justifications to be made at the time of the termination could allow new administrations to cancel grants made under previous agency leadership. If grants can be terminated as the result of political changes, it becomes harder for groups to conduct long-term planning or research and create instability in project implementation. It could also undermine science and research critical to the Great Lakes and region by making long-term research and existing grants uncertain and unreliable. Other sections that apply to termination include § 200.211, § 200.341, § 200.342, § 200.343.

In addition to our general concerns, we also have specific concerns related to the proposal's impact on Great Lakes science. Grant funded research across Midwestern colleges and universities is essential to understanding the impacts of climate change on the Great Lakes, the health of communities across the region, and state and regional economies. Yearly Mean Temperatures are rising in the Great Lakes states of Minnesota, Wisconsin, Illinois, Indiana, Michigan, Ohio, Pennsylvania, and New York. The Midwest has already warmed another two-thirds as much (1.1°F) as it did in the decades before that (1.6°F), so warming is accelerating. Research shows that this warming threatens communities with extremes in temperature and precipitation, threats from flooding, more dangerous heat and tick-borne diseases, impacts ice cover on the Lakes which disrupts ecosystems and shoreline erosion, contributes to worsening toxic algal blooms threatening drinking water and fisheries, impacts weather dependent tourism. A 2019 report and a 2025 [update](#) demonstrate how federal funded research can inform the public and decision-makers at all levels. As noted above, several sections of the OMB proposal will undermine peer-reviewed science grantmaking, threaten multi-year research and labs and the public's access to that information. § 200.205, § 200.208, § 200.340

The proposed rule could interfere with our region's ability to restore and protect the Great Lakes. It adds additional administrative burdens and allows agencies to make decisions based on changing administrative policy rather than statutory requirements. We oppose these changes and ask the administration to withdraw the proposal without delay.

Sincerely,

Alliance for the Great Lakes
Cayuga Lake Watershed Network
Clean Wisconsin
Clinton River Watershed Council
Conservation Resource Alliance
Council of Great Lakes Region
Dwight Lydell Chapter of the Izaak Walton League
Environmental Law & Policy Center
Flow Water Advocates
Freshwater Future
Friends of the Crooked River
Friends of the Fox River
Friends of the Rouge
Gary Advocates for Responsible Development(GARD)
Genesee Land Trust Inc.
Great Lakes Business Network
Green Lake Association
Huron River Watershed Council
Illinois Division of the Izaak Walton League
Indiana Sportsmen Roundtable
International Association for Great Lakes Research

Izaak Walton League of America
Junction Coalition
Lake Erie Advocates
Lake Erie Charter Boat Association
Lake Superior Watershed Conservancy
Michigan League of Conservation Voters
Michigan Sustainable Business Forum
Milwaukee Riverkeeper
Milwaukee Water Commons
Minnesota Environmental Partnership
MN Division - Izaak Walton League of America
National Museum of the Great Lakes
National Parks Conservation Association
Onondaga Audubon
Openlands
Owasco Lake Watershed Management Council, Inc.
Partners for Clean Streams, Inc.
PennFuture
Religious Coalition for the Great Lakes
River Alliance of Wisconsin
Saugatuck Dunes Coastal Alliance
Sierra Club Illinois Chapter
The Wetlands Initiative
Tinkers Creek Watershed Partners
Winous Point Marsh Conservancy
Wisdom Institute
Young, Gifted & Green