



May 15, 2009

Carolyn O'Neill  
Manager  
Land and Water Policy Branch  
Ministry of the Environment  
6<sup>th</sup> Floor  
135 St. Clair Avenue West  
Toronto Ontario  
M4V 1P5

**RE: Discussion Paper: Healthy Great Lakes, Strong Ontario. Talking with Ontarians about Protecting, Restoring, Using and Enjoying the Great Lakes (EBR #010-6105)**

Dear Ms. O'Neill,

Thank you for the opportunity to comment on the Province's proposed Vision, Goals and Strategies for the Great Lakes. Conservation Authorities are very supportive of the message from the Ministers of Environment, Natural Resources and Agriculture, Food and Rural Affairs in proposing a Vision, Goals and Strategies for the Great Lakes, and their adoption of a vision of sustainability for the Great Lakes and their watersheds. The Ministers are to be congratulated on this discussion paper, and for hosting forums on a Lake-by-Lake basis. Conservation Ontario supports (with some suggested additions) the Province's stated five goals and nine strategies for the Great Lakes.

Conservation Ontario's Position on Great Lakes Sustainability (2006) identifies as its mission to "work with all orders of government and basin residents as stewards to protect and improve the unique, shared Great Lakes and St. Lawrence ecosystem for present and future generations". The Guiding Principle is to "apply an integrated watershed management approach to planning and implementation in order to protect and improve the Great Lakes and St. Lawrence Ecosystem."

Thirty-five of our 36 watershed-based jurisdictions drain to the Great Lakes/St. Lawrence system. We envision a leadership and coordination role for Conservation Authorities on Lake-based and Watershed-based Planning (discussed on page 17 of the Paper) in continued efforts to restore and protect the Great Lakes/St. Lawrence system. There is a need in Ontario for a program of watershed-based planning and implementation, with sustained funding by senior governments. The watershed planning program would build on the existing strengths and experience of the Conservation Authorities (for example, with the prior development of watershed plans and natural heritage strategies), the Drinking Water Source Protection initiative, and the Remedial

Action Plans. As proposed by the Discussion Paper, the program would target priority watersheds around the Lakes. It would bring together a diverse group of interested parties in each priority watershed thus connecting them to the Great Lakes. It would integrate a range of environment issues and responses including climate change (with ties to economic, social, and cultural benefits). The plans would demonstrate the relationship to the Great Lake's nearshore and aspects of the plans could link directly to the achievement of the Great Lakes targets (for Source Protection) that can be established by the Ontario Minister of the Environment under Section 85(1) of the *Clean Water Act, 2006*. Overall, watershed planning and implementation has and will continue to contribute to the realization of all of the proposed Goals in the Paper.

### Specific Comments

Conservation Ontario is recommending an additional goal: Integrated Approach. There should be a goal related to taking an integrated approach in terms of governance, policy development and implementation, research and monitoring, capital assistance programs and education and communication/outreach programs. There is a lack of a solid framework to focus the efforts of the many partners and interests on producing positive results for the Great Lakes. In other words there are many agencies and organizations, both government and non-government, that are doing vital work but the pieces are not being fit together to produce a more positive result. For example, it is critical that the Ministers of Municipal Affairs and Housing, and Energy and Infrastructure incorporate Great Lakes sustainability objectives in Ontario's economic, growth and infrastructure decision making. Otherwise, the Province's strategic initiatives may be counter to efforts to restore the Great Lakes. Information sharing between all levels of government and local agencies such as Conservation Authorities is a critical piece.

To facilitate integration, Conservation Ontario supports the proposal of the Great Lakes St. Lawrence Cities Initiative (GLSLCI) Mayors (report released May 5, 2009) that a municipal, provincial and federal political lead table needs to meet on a regular basis. This would be a positive advancement in the governance around the Canada-Ontario Agreement and should lead to greater levels of investment at all levels of government. Conservation Authorities are formed under the *Conservation Authorities Act* by their Municipalities to represent the watershed interests and the Board of Directors are appointed by watershed municipalities. Both the Provincial Vision document and the Municipal GLSLCI document indicate support for watershed planning and both acknowledge the partnering relationship with Conservation Authorities. As locally governed watershed based organizations with a mandate to manage natural resources using a partnership, science based approach, Conservation Authorities should have a central role in developing and implementing Great Lakes programming. To represent the watershed interests; it is respectfully submitted that the Chair of Conservation Ontario (as elected by the member Conservation Authorities from their CA Board representatives) has a seat at the Ministers and Mayors table.

Additionally, Conservation Ontario supports the proposed (GLSLCI, May 5, 2009) "new Great Lakes Table that involves senior representatives from all three levels of government" with the addition of Conservation Ontario representation at this table. The Conservation Authorities have a long history of collaborative approaches engaging all three levels of government and want to continue in this regard. Conservation Ontario would identify senior representatives as follows:

- Basin-wide: CO Manager, one window contact for Great Lakes and will facilitate overall integration between discussions at the lead table and the senior table and amongst the member Conservation Authorities and amongst CO program areas (e.g. source water protection, stewardship, communications); and,
- General Managers (7) to represent each Lake as follows: Lake Superior (1), Lake Huron (2 – including Lake Simcoe as part of basin and transfer from Lake Simcoe Protection Act & Plan experience), Lake Erie: (2 - West-includes Lake St.Clair; East), and, Lake Ontario: (2 – 1 each West and East).

When dictated by the agenda, these senior representatives will identify CA staff with specific expertise to provide presentations. As well, a lead staff contact for Great Lakes can be identified for each Conservation Authority. Business interests are broad across Conservation Authorities such that this individual will act as the one window contact when initiatives are being considered within that Conservation Authority's watershed jurisdiction. Every effort will be made to link provincial program managers with the appropriate staff expertise in order to facilitate integrated work planning.

#### Strategy #2 – Protect Human and Ecosystem Health

The discussion of “Activities” for this particular Strategy is very limited compared to other strategies and should be built upon. Additional details on the threats and required activities include: the potential threat posed by tributaries affecting nearshore water quality and therefore raw water quality at shoreline drinking water intakes and beaches. These threats must be mitigated through effective watershed restoration and protection. Priority setting through science is essential. The implementation phase of source protection planning efforts that have been occurring under the *Clean Water Act* needs to be discussed. A clearer picture of Source Protection Plan implementation needs to be developed in order to maintain the current investment and program momentum towards drinking water protection.

#### Strategy #3 - Restore Habitats and Protect Biodiversity

Conservation Ontario is a member of bi-national, multi-stakeholder Steering Committees for development and finalization of Biodiversity Conservation Strategies for Lakes Ontario and Huron. The Lake Ontario BCS indicates a strong bi-national support for watershed plans (e.g. for climate change adaptation strategies and targeting critical lands/waters for protection). Additionally it recommends linkages between watershed plans & nearshore ecosystem health for identification of key watershed management actions that will benefit Lake Ontario biodiversity.

#### Strategy #4 - Adapt to climate change

The Climate Change strategy should strengthen its focus on mitigation, as well as addressing adaptation. As well, in addition to “coastal communities” this strategy needs to emphasize the watershed relationship. Threats from the watersheds via intense storm events will have an impact on the nearshore environment especially with respect to loadings from non-point and point sources within watersheds. Watershed-based water balance analyses and modelling linking quantity to quality will be critical in assessing priority watershed actions to benefit the nearshore. It will be important to examine population growth projections and land use change scenarios that are watershed-based and modelled for the climate change predictions that demonstrate the range

of variability for which we need to manage. Best management actions for adapting to climate change can then be targeted specific to watershed characteristics in watershed plans. In general, actions that keep water on the landscape to minimize high volume flows during intense storms is a critical aspect to minimize impacts of stormwater and has the additional benefit of retaining water for times of drought. Actions might include, enhanced stormwater management and low impact development, acquisition of large natural areas, protecting forest cover and wetlands, and stream naturalization.

Conservation Ontario has contributed expertise to Provincial and Federal discussions around Great Lakes shoreline development and climate change. The climate change discussions should reference the implications of changing water levels and encroachment into the exposed areas by development pressures and impacts to nearshore ecosystems; as well as, the implications of no ice cover on the lakes during winter storms and the consequent storm surge impact on existing and proposed shoreline development. Collaboration across agencies and levels of government is necessary to develop integrated shoreline management plans that address:

- the range of variability for climate change as it affects natural hazards & nearshore ecosystems,
- adaptation strategies for resilience of human shoreline & ecological communities, and,
- the relationship to watershed inputs/loadings.

#### Strategy #7 - Enhance Lake-based and Watershed-based Planning and Action

Conservation Ontario recognizes the critical importance of Strategy #7, and encourages the Province to specifically reference the Conservation Authority model that currently exists and to utilize Ontario's Conservation Authorities to lead the watershed-based planning and action required to "Enhance Lake-Based and Watershed-Based Planning and Action". In fact, watershed planning and action is a key strategy that should be a foundation for developing the actions required to implement many of the other strategies. The Province needs to continue building on the success of watershed-based planning and actions through long-term funding commitments for Great Lake Basin specific initiatives.

The reference to linking with Drinking Water Source Protection Planning is very important. Unfortunately, the existing emphasis of Source Water Protection does not properly adopt a watershed approach e.g., current focus on limited Intake Protection Zone areas. It should be noted that there are issues with the source water at a number of municipal drinking water intakes on the Great Lakes, such as nutrients and pathogens, which are clearly associated with watershed effects. These chronic and cumulative watershed effects are also clearly associated with other problems such as excessive algae and very poor water quality at public beaches.

Additional work is required to better understand the linkages between watershed actions and the health of nearshore areas of the Great lakes. Further to the Strategy's "potential action" to identify "priority watersheds for each Great Lake and taking stewardship actions to address non-point source loadings in those watersheds", Conservation Ontario will work collaboratively on a detailed action plan. Conservation Ontario, with Federal funding, hosted a multi-agency technical workshop "Managing Watersheds for Great Lakes Benefits – Nutrients in the Nearshore" on March 3-4, 2009, to discuss the watershed and nearshore relationship. The

workshop identified current threats as being population growth, changing land use practices, invasive species, and climate change and further identified that without action, eutrophication and the growth of nuisance algae will increase, and will affect fisheries, recreational resources, waterfronts and drinking water. Workshop recommendations detail an action plan for implementing a Great Lakes Nutrient Strategy that: promotes collaboration and integration, is science-based and adaptive, and encourages stewardship actions in the watersheds. The workshop report will be available shortly.

Science and Monitoring needs to be strengthened overall in the Vision document and especially to confirm threats (e.g., individual tributaries, point sources, non-point sources) and set priorities for restoration, enhancement and/or protection. This must be done with regard for climate change predictions. In particular, coordinated and adequately resourced contaminant loading calculations and estimates (e.g. quantities and timing of delivery) need to be worked up for Great Lakes' tributaries; the role of nearshore cycling of nutrients needs to be better understood; and, a quantification of point source versus non-point sources of contaminants (perhaps best expressed on a regional basis) is required. The establishment of long-term and adequate monitoring programs is also a necessity to maintain and enhance data collected through initial scientific investigations. This would include not only support for upfront science and data collection but also long-term management and maintenance of information for future decision making and understanding of improvements to the Great Lakes.

#### Strategy #9 - Sustainable Great Lakes Economic Opportunities

Conservation Ontario supports the strategy to “*Develop sustainable Great Lakes economic opportunities*” and specifically the need for “quantifying and valuing the benefits of the ~~lakes~~ **Great Lakes basin**”. For example, as referenced in the Walkerton Inquiry, there is a financial benefit to protecting our drinking water at the source rather than having to clean up polluted resources. The cost of prevention has been found to be much cheaper than remediation after the fact.

#### Sustainable Funding

All levels of government will need to collaborate and take on a leadership role by not only identifying the issues and goals but developing an implementation strategy that puts staff and resources in place to allow momentum to build and community action to occur. This includes ensuring program funding supports the administrative and staff expertise required to implement activities at the local level. Senior levels of government must ensure effectiveness, efficiency and no duplication of programs, as well as establishing policy direction. Planning and implementation should be delivered at the local level.

Adequate funding is required and therefore, greater investment in the Great Lakes by all levels of government. It is understood that the Province is developing its long-term Vision for the Great Lakes in advance of the renewal of the *Great Lakes Water Quality Agreement* (1978, as amended in 1987) and the Canada Ontario Agreement (2007). As part of these negotiations, the Province should advocate for increased and sustained Federal funding for the Great Lakes, in keeping with recent funding announcements in the United States. Similarly, the Province must set an example

by increasing its funding and thus, demonstrate that the protection and restoration of the Great Lakes is an investment rather than a cost.

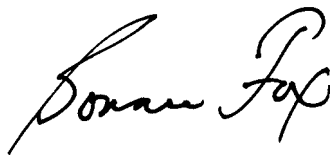
Conservation Ontario has been pursuing federal funding for a Healthy Watersheds/Healthy Great Lakes program since 2002. The most recent version (2008) targeted particular activities based on our watershed knowledge that would benefit Great Lakes quality. This scoped proposal could be built upon as it reflects many of the key actions/priorities promoted in the Provincial Vision and the Municipal GLSLCI report (May 5, 2009). The proposal requests funding for actions such as: stormwater management and conveyance system retrofits and urban non-point sources pollution reduction projects; projects that protect and restore natural areas, and, non-point source pollution reduction projects including buffer strip plantings, septic system upgrades, soil erosion control structures, and enhanced livestock management projects.

#### Conclusion

Conservation Ontario strongly desires to be part of next steps, including the development of an integrated action plan/work plan. With strong leadership from the Province, an inclusive, detailed, aggressive and integrated action plan is required to effectively realize the goals and to implement the strategies.

If you have any questions regarding these comments, please contact myself at 905-895-0716 ext. 223. It should be noted that these comments are not intended to limit your review of submissions made by our member Conservation Authorities.

Sincerely,



Bonnie Fox  
Manager, Policy and Planning

c.c. Environmental Commissioner of Ontario  
All Conservation Authorities General Managers/CAOs