



June 14, 2012

Bernard Beckhoff
Public Affairs Advisor
International Joint Commission
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Ottawa, ON
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Re: Lake Ontario and St. Lawrence River: A New Path Forward

Dear Mr. Beckhoff,

Thank you for the opportunity to comment on the International Joint Commission's (IJC) proposed new Approach to Managing levels and flows in the Lake Ontario-St. Lawrence River system. The IJC led an inclusive consultation process and both Conservation Ontario (CO) and Conservation Authority (CA) staff were pleased to participate at a number of the public information sessions.

Conservation Ontario and its member Conservation Authorities provide the following comments on Plan Bv7 for your consideration:

- Conservation Ontario and its member Conservation Authorities support Plan Bv7 which clearly addresses concerns related to water level impacts to coastal wetlands.
- It is our understanding that the Plan Bv7 is similar to Plan B+ previously supported by Conservation Ontario (letter dated July 11, 2008); however no information was found comparing Plan B+ with the new Plan Bv7. It is assumed that since no updated reports have been posted, with the exception of that pertaining to storm surge and wave applications and technical description, that there is no significant change in the modelling, analysis or application of the Plan or Adaptive Management Action Plan from Plan B+. If this is not the case, we would respectfully request that this information be provided to determine/understand the implications of these changes on natural heritage features and functions.
- The Lake Ontario and St. Lawrence shoreline provides a dynamic confluence of riverine, wetland, littoral, and lacustrine waters and habitats. It is within this system that Conservation Authorities are major landowners responsible for major wetland creation and rehabilitation projects and resource managers responsible for this system's health and contribution to a healthy Great Lakes ecosystem. The details of the Plan Bv7 will help optimize the diversity and function of the coastal habitats.

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- Existing development within the shoreline hazard zone may require mitigation. Any predicted small increases in shoreline erosion and flooding under Plan Bv7 should be managed with measures employed by various levels of government, including conservation authorities' regulation of development within hazardous lands and in partnership with the appropriate levels of government. The health of the overall river and lake environment should not be compromised because of this development.
- Conservation Ontario and its member Conservation Authorities will continue to support an Adaptive Management approach and recommendations by providing monitoring information, analysis and commenting on future plan adjustments, as budgets permit. Conservation Authorities are responsible for issuing permissions for shoreline development activities including shoreline protection works, and have a vested interest in participating in an adaptive management approach to Great Lakes shoreline management as the only practical way to develop understanding of the factors, drivers and impacts of a changing climate. The adaptive management approach focuses on vulnerabilities such as shoreline flooding, erosion, and low water levels which are core to Conservation Authority watershed/shoreline management activities.
- Ontario's Conservation Authorities will continue to implement current shoreline management approaches and shoreline regulations that are compatible with Plan Bv7.
- The monitoring and adaptive management approach is key to assessing the benefits of a new regulation plan and future refinements. It is recognized that there is a need to secure other governmental funding, in addition to the Commission's budget, to implement an adaptive management plan.
- On implementation, it is understood that a proposed new Order will provide clearer direction for the IJC's Board on short term discretionary deviations and emergency deviations. It is generally supported that deviations from the flows determined by the regulation plan must be minimized to realize the anticipated Plan benefits.

Again, thank you for the opportunity to provide comments on the IJC new approach to managing water levels and flows and we look forward to participating in future consultation with the IJC. If you require clarification on any of the comments, please contact Bonnie Fox, Manager, Policy and Planning at (905) 895-0716, ext. 223 or Nancy Gaffney, Waterfront Specialist, Toronto and Region Conservation at (416) 661-6600, ext. 5313.

Sincerely,



Dick Hibma
Chair