



July 12, 2016

Canadian GLEC Secretariat  
Great Lakes Environment Office  
Environment and Climate Change Canada  
Email: [ec.aqegl-glwqa.ec@canada.ca](mailto:ec.aqegl-glwqa.ec@canada.ca)

To whom it may concern,

**Re: The Great Lakes Nearshore Framework – May 2016 version**

We would like to thank you for the opportunity to review and provide comments on the draft document entitled '*The Great Lakes Nearshore Framework*' prepared by the Lakewide Management Annex Nearshore Framework Task Team.

Conservation Ontario is submitting coordinated comments for this report based on the feedback we received from 3 Conservation Authorities and Conservation Ontario staff's own review of the report. We are supportive of this initiative and appreciate the time and effort the task team has put into creating the draft framework. We have broken our comments into general comments and by section as they relate to the report.

**General Comments:**

- Conservation Ontario appreciates that the scope of the Great Lakes Nearshore Framework recognizes the interconnectedness with the contributing watersheds and "the relationship between the zone of impact in the lakes and the zone of influence (the location where a problem originates, which can occur up in the watersheds far-removed from the lakes themselves)"(p.5).
- Conservation Ontario agrees that the pilot testing in 2016-2017 is necessary to further refine the Framework. The comments provided are intended to flag issues from a local implementation perspective unless it is stated that the Framework be amended.
- It is recommended that there be more linkages to land-lake interactions. Watersheds are an obvious stressor for the lake nearshore and watershed planning/ management should be identified as an outcome. Conservation Ontario recommends that the pilot testing be done in two areas; one high quality and one stressed and that at least one of the pilot areas has a contributing watershed with a watershed plan.
- It is appreciated that cumulative impacts is recognized in the framework however, it is not clear how they will be assessed other than there are many stresses.

**Purpose and Scope:**

- Rather than a summary it is suggested that the Framework be amended to include the Annex 2 B (7) clause of the GLWQA and associated objectives.
- The current definition of the lake nearshore is felt to be ambiguous and not clearly discernable. This can be revisited during the course of the pilot testing.

- Given that multiple organizations will be involved in monitoring the lake nearshore, common data and meta-data standards should be adopted to ensure consistency between monitoring agencies.
- Comprehensive Assessment of Nearshore Waters: The comprehensive assessment is dependent on stakeholder engagement and data. Conservation Authority staff are unclear as to how they would be engaged and feel a strategy should be developed to further engage with those organizations as it will be key in defining the variables that should be used to monitor the lake nearshore (i.e. lessons learned).
- Further to the above point, the following amendment to the framework is suggested: “Knowledge of ecological thresholds, other Great Lakes assessments, stressor information, indicators and, **local and** traditional ecological knowledge will be used to aid...”(p.8).
- Additional work needs to be done to establish standardized methodologies and terminology to be used in categorizing and quantifying stresses.

#### **Action:**

- It is suggested that the Framework be amended to specifically reference Annex 2: C of the GLWQA as it is a key to coordination of “Action”
- Activities should be informed by recommendations derived from watershed plans as these will have the largest influence on the lake nearshore.
- We recommend mapping products be scaled appropriately for local decision making and planning purposes. We also recommend that there be a mechanism to share mapping products between stakeholders (i.e. online mapping portal).

#### **Continuous Learning and Adaptive Management:**

- It is suggested that the Framework be amended to specifically reference Annex 2: D of the GLWQA as it is key to reporting and it is related to “continuous learning and adaptive management” and to “action”
- Further to concerns with the 5 year sampling period, it is recommended that more frequent monitoring is necessary to establish natural variability or baseline levels. It is suggested that a power analysis could be completed at a few select sites to achieve this.
- The first activity should be assessment of improvements resulting from the implemented actions. A revised framework based off learning from the previous round should be included in the outcomes.
- The framework doesn’t indicate which standards and indices will be referenced for the purpose of assessing environmental health. Common/ minimum standards should be established.

#### **The Path Forward:**

- The proposed pilot studies should be determined in consultation with local conservation and watershed management agencies and municipalities along the nearshore. Conservation Ontario recommends that the Framework be amended (p.13) to indicate a commitment (rather than ‘ideally’) to pilot testing in two areas; one high quality and one stressed. Ideally at least one of the pilot areas should have a contributing watershed with a watershed plan.
- It is noted that the proposed approach is likely to overlook vast areas of the Great Lakes nearshore because they are not degraded or of high quality habitat.
- It is recommended that the pilot testing be advised by a multi-stakeholder advisory committee so that the outcomes take into account some of the detailed comments raised in this letter and facilitate future collaboration with local implementers.

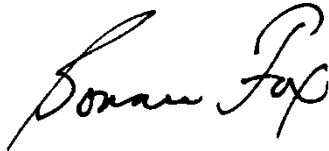
- It's unclear how parties will be made aware of actions and how the actions will inform the parameters that are subsequently monitored. The framework should more clearly describe these connections in the cycle.
- Identified that collaboration between organizations will be important which highlights the need for common tools to undertake the work. Communications of monitoring activities is also important so that there is better coordination/ less overlap.

**Appendix 1:**

- As part of the baseline survey remotely sensed data is expected to play an important role. There should be some mechanism or standard implemented for the field verification of this data.
- Also, see comments on the "Comprehensive Assessment of Nearshore Waters" section

Overall we are supportive of the nearshore framework recognizing that it will be modified based on lessons learned from the pilot testing. It is our view that the current version remains too high a level and would benefit from additional details and context to better engage local collaborations in the future. Should you have any further questions with regard to these comments please contact myself (ext 223) or Matthew Millar, Special Project Coordinator ([mmillar@conservationontario.ca](mailto:mmillar@conservationontario.ca), 905-895-0716 ext 234).

Sincerely,

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

Bonnie Fox  
Manager, Policy and Planning