



# The Ontario Headwaters Institute

December 29, 2015

Liz LaPlante  
Great Lakes National Program Office  
U.S. Environmental Protection Agency  
PDF via e-mail

Laurie Wood  
Great Lakes Program Office  
Environment Canada  
PDF via e-mail

**Re: Draft 2015 Lake Superior Lakewide Action and Management Plan**

Dear Ms LaPlante and Ms Wood,

The Ontario Headwaters Institute, a registered charity that works to preserve the province's headwaters and their watersheds through research, education, and best practices, offers the following additional comments to those expressed in a submission dated December 23 that we co-signed with 34 other organizations.

- 1. We urge the governments to address the inconsistent use of the terms basin, lakewide, lakewide ecosystem, and ecosystem, and to re-balance the focus of the draft plan on the lake with one founded in adaptive watershed management.**

We understand the predominant focus of core bi-national agreements on the Great Lakes on water; the unusual ratio between the surface area of Lake Superior and that of its watershed; that dealing with aspects such as coastal wetlands and the near-shore requires lake-based science; and we are encouraged by references to tributaries. Nonetheless, the bi-national agreements are not exclusively focused on the Lakes, and we find that the terms above are used indiscriminately. Worse, the "Fair" status of the tributaries and watersheds on page 5, the suggestion that Lake Superior's ecosystem is just the lake as on page 10, that healthy downstream fish populations should be the sole purpose of maintaining tributaries in good ecological condition as on page 15, the almost singular link between climate change and tributary temperature on page 32, the map on page 41 that does not link mining to sediment or chemical pollution downstream, and numerous other sections of text combine to present a narrow view that needs rehabilitation to a watershed perspective, as well as a dedication to adaptive management.

- 2. While this is a draft plan, and while it notes the need for further science to help it evolve, we urge the governments to include a commitment to a Monitoring-to-Stewardship Program in the final plan.**

A Monitoring-to-Stewardship Program is a three-stage effort in which:

- a. Monitoring identifies a problem, such as poor water quality or habitat fragmentation;
- b. Further investigation is pursued to identify the source or cause of the problem; and,
- c. Pro-active stewardship efforts are launched to limit or reverse the impact(s) of the problem.

A commitment to a Monitoring-to-Stewardship Program would fill a large gap in the draft by declaring the governments' interest in meaningful stewardship programs, including needed sectoral initiatives, to which reference in the draft plan is sorely lacking.

Sincerely,

*Andrew McCammon*

Executive Director