

**Comments of October 31, 2022, RE:**

**Draft 2023 – 2025 Great Lakes Binational Priorities for Science and Action**

To: Great Lakes National Program Office, US EPA  
 Great Lakes Environment Office, Environment and Climate Change Canada  
 Cc: International Joint Commission

The Ontario Headwaters Institute is an Ontario corporation with federal charitable status working to protect our watersheds, their natural heritage, and receiving waters. We offer the following comments to the Parties as they consider draft updates to Science and Action Priorities (SPAs) on the Great Lakes Water Quality Agreement, and we copy the International Joint Commission (IJC) due to their role in actions related to their mandate for public outreach and education.

Please note that the OHI is a member of the Great Lakes Ecoregion Network. We support their comments as they support ours.

As the Parties and the IJC are aware, the Great Lakes Water Quality Agreement (the Agreement) refers frequently to the “Great Lakes Basin Eco-system”, a “healthy and prosperous Graet Lakes region”, and “the critical ecological links between watersheds and the open waters of the Great Lakes”.

Various definitions and commitments underscore the importance of watersheds to the Great Lakes, with repeated reference to watersheds, adaptive management, an ecosystem approach, tributary management, and a commitment to address watershed management in a manner toward “restoring and maintaining surface waters that flow into and impact the quality of the Waters of the Great Lakes”.

In practice, and while some annexes such as those relating to Discharges from Vessels and Aquatic Invasive Species lend themselves to an almost exclusive focus on the Lakes, most of the draft SAPs, as well as aspects related to their implementation, either the lack a watershed management framework and/or any consistent application of a watershed management approach varies across the draft SPAs.

Our Comments

**Annex(es)      Science Priorities**

**Action Priorities**

<p>1, 2, 3, and 4</p>	<p>Sampling in Annex I appears to be focused on historic pollutants that were more point source than newer threats, many of which are non-point sources and may be included in Annex III CMCs, while Annex IV talks about upstream aspects such as edge-of-field and tributary monitoring.</p> <p>The OHI suggests increased harmonization of methods based on Integrated Watershed Management which could lend itself to cumulative monitoring that could depict a more accurate snap-shot of the overall health of the regional ecosystem.</p>	<p>We suggest the development of a program similar to Lakewide Management, perhaps a Watershed Management program, to address water quality impairments that stem from land-based activities and that might lead to recommended land use planning BMPs.</p> <p>We are particularly impressed with a suggested action to identify priority watersheds under Annex IV, but strongly suggest this should not be tied exclusively to Annex IV.</p> <p>We also suggest that the Parties and the IJC should use watershed as the logical basis for public and sectoral engagement.</p>
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5 and 6	No comments	
7	While coastal wetlands are important for the Great Lakes, the vast areas upstream of the Lakes provide nutrients, sediment, water quality, and niche habitat at least equal to the health of the Lakes and its species. We believe there is not much point in protecting and restoring coastal habitat if whole watersheds pass tipping points on which the biodiversity of the region depends. Also see Annex 9 below.	
8	The wording here, to study non-point sources and their transport downstream, stands in stark contract to the narrow vision described in the first line of this chart.  We suggest Annex 8 be added to the efforts to better integrate Annexes 1 to 4.	We suggest the Parties and the IJC make existing groundwater mapping in the Great Lakes Basin available to the public as soon as possible, within a watershed basis for public and sectoral engagement.
9	The priorities here magnify an inappropriately narrow focus on the Lakes. We suggest that the Parties need to study how climate change might impact the Basin's watersheds and habitats, altering flow, water temperature, water chemistry, and biodiversity.	The increased public knowledge you seek to foster will be of greater interest if offered on the Basin as opposed to just the Lakes.
10	No comments	

In addition to the comments above, we offer two over-arching recommendations:

1. That the Science and Action Priorities should balance the historic concentration of past efforts on the receiving waters of the Great Lakes with an integrated watershed management focus on the Basin, particularly with respect to pollutants, biodiversity, and climate change; and,
2. That the Parties and the International Joint Commission should consider the benefits of taking a watershed approach to public engagement.

We thank you for the opportunity of providing comments and are available for discussion if desired.

Sincerely,

*Andrew*

Andrew McCammon  
Executive Director