



July 29, 2015

Mr. Michael Goffin  
Regional Director General  
Environment Canada -- Ontario Region  
4905 Dufferin Street  
Toronto, Ontario M3H 5T4  
Canada

Ms. Susan Hedman (R-19J)  
USEPA Region 5 Administrator  
77 West Jackson Boulevard  
Chicago, IL 60604-3507

***Re: Comments and Observations regarding the GLEC Meeting on June 24-25, 2015***

Dear Michael and Susan:

On behalf of members of the Council of Great Lakes Industries, we would like to thank you for the opportunity to participate in the June 24-25, 2015 meeting of the Great Lakes Executive Committee (GLEC) as an observer organization. We offer CGLI's observer comments in this letter because we were unable to provide comments at the meeting due to time constraints.

General Comment

Given the breadth of scope of the revised Great Lakes Water Quality Agreement (GLWQA), reports of the activities and work products of each of the ten Annex subcommittees must be brief and well-organized. At the June meeting, reports of progress were very much appreciated and in several cases even were inspirational. However, much valuable time was used by some Annex co-chairs to describe or explain the specific requirements of the Agreement during their reports. It was as if the Agreement was being read to meeting attendees, which seems unnecessary at this stage of GLWQA implementation.

We agree that it is important to recognize and understand the various requirements of the Agreement in order to provide context for progress reports and other meeting activities. However, the guiding principles of the GLWQA might be made available to GLEC meeting attendees more efficiently if the Secretariat (or someone else) were to include a brief one- or two-page summary of Annex objectives and requirements in the pre-meeting package, and ask each Annex co-chair to refer to the printed material (if necessary) instead of reiterating GLWQA provisions as part of their progress reports. This would allow more time at the meeting for describing Annex subcommittee work products and the progress that each Annex subcommittee has made in accomplishing the purposes of the Agreement. Streamlining the reports in this way also would allow for more time for input from and discussion with meeting attendees.

### Annex 2 (Lakewide Management)

Lakewide Management Plans (LaMPs) have historically been an important mechanism for coordinating the development of lake-specific needs, objectives and management actions. We appreciate that the Annex 2 co-leads have incorporated a thoughtful approach to coordinating shared agency actions into the new LAMP development and implementation.

However, the stakeholder engagement component of the LAMP development and implementation process should be more robust, encouraged, and strengthened. Whereas previous LaMP development, progress tracking, and other activities have benefited substantially from multi-stakeholder engagement, the co-leads' description of the stakeholder engagement element of the renewed LAMP development process was quite vague. In addition, while the co-leads convened a webinar following the GLEC meeting that we attended along with more than 300 others, much of the session was devoted to reviewing and reiterating Annex 2 provisions rather than providing a meaningful opportunity for stakeholder engagement.

We strongly suggest that the co-leads develop and support an outreach program that includes a true opportunity for meaningful stakeholder input into the LAMP development process. Such a process would include opportunities for smaller groups comprised of both agency personnel and non-agency stakeholders to share information, experience, and ideas on lakewide issues. Meaningful stakeholder engagement would produce the regional teamwork that is needed to achieve the goals and objectives of the GLWQA.

### Annex 3 (Chemicals of Mutual Concern)

CGLI has appreciated the opportunity that Dale and our members have had to evaluate chemicals nominated for potential listing as chemicals of mutual concern (CMCs). As you know, we learned during this experience that assessing CMC candidates is very resource intensive. It is important for reviewers to utilize the data sets and exercise the expertise that the Parties have generated through their respective national chemical assessment programs, which can be complex and time-consuming. As we have mentioned previously, complete chemical reviews likely will require a larger commitment of resources and expertise than was made available by the Parties during this first round.

The rationale for selecting the candidates for the first round (some "old" vs. some "new" compounds, materials found in the environment vs. used in products, etc.) tested and helped to refine the process. We strongly believe that substances selected for final CMC designation must include only those materials that require special regional management action to supplement management activities associated with Canadian and US national programs. We also believe that substances should be designated CMCs only if there is assurance that region-specific management actions can be successful in addressing a region specific need. The process for selecting candidate substances must be tailored to this final outcome. Ultimately, in order to end up with a manageable list of materials for which meaningful management actions can be applied, the list must be short. The Parties must avoid listing large numbers of chemicals solely on the basis of their presence in the region or concerns of chemical "hazard."

#### Annex 4 (Nutrients)

The posting of proposed Binational Lake Erie Phosphorus targets is an important step in addressing the most perplexing problem of harmful algal blooms. With all the energy and attention that is being paid to this issue, we believe the Parties have an opportunity to exercise true leadership by coordinating the many groups and organizations that are working in this area. Posting targets is an important step in this process, but following up by developing a detailed “road-map” that describes how the targets fit with other work in this area is needed.

#### Annex 7 (Habitat and Species)

Establishing targets for net habitat gain in the Great Lakes region has long been an objective of resource managers. What has been missing from Great Lakes habitat programs, however, has been the ability to link habitat targets to sub-regional land management plans. Success in achieving habitat targets is very much dependent on opportunities related to the use of land. Unless the targets are linked to realistic land management opportunities, it is not possible to determine whether or not the targets can be achieved.

The visit to Northerly Island illustrated this point. If the Northerly Island real estate had not been available for public use, the development of the island as a conservation area would not have been possible. We suggest that the Annex 7 subcommittee seek closer relationships with local planning agencies, landowners, and stakeholder groups when setting habitat targets and projecting success in achieving Annex 7 goals and objectives.

#### Annex 8 (Groundwater)

While many of the annex subcommittees provided interesting and even inspirational reports, we believe the Annex 8 report was particularly well done. The Annex 8 subcommittee provided a detailed overview of the information that will be provided in the upcoming written report. Presumably, a robust public review and comment opportunity of the draft report will be provided.

#### Annex 9 (Climate Change Impacts)

The climate change report also succinctly described forthcoming Annex 9 work products, which we expect will provide important resources for the Great Lakes community. Soliciting comments on the Annex 9 work products, or better yet convening one or more workshops on the content of the Annex 9 work products, would improve uptake and utilization of this important information.

#### Annex 10 (Science)

The science report and the prolonged discussion that followed regarding the region’s need for data and information to support decision-making, as well as the best way to communicate data and information to the public, was robust and could be quite helpful in identifying future priorities. We suggest that the Parties continue this dialog in a multi-stakeholder framework before the next GLEC meeting. Continued discussions could bridge the gaps that always seem to accompany discussions on this topic.

We agree that the need exists to pare down the list of indicators used to describe the State of the Lakes. However, we also believe that the indicators (and the interpretation of them) must be

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based on a full range of data points (metrics) that represent the diversity that exists both within the Great Lakes region and between the lakes themselves. The quest for a short list of indicators should not lead to a lack of support for collecting the full range of scientific information needed to prioritize management actions related to lake resources.

The emphasis on metadata and data validation, especially in the context of lake monitoring collaboratives and “citizen science,” must continue. We urge the Annex 10 co-leads to consider holding stakeholder inclusive workshops on these topics – both prior to and as a part of the upcoming 2016 triennial State of the Lakes review. It was most encouraging to hear of plans to collaborate with the Great Lakes Observing System as a part of the next GLEC meeting. Perhaps an extended effort in this area could be arranged through a joint workshop or other format just prior to or following the GLEC meeting in December.

Thank you once again for the opportunity to participate in the GLEC meeting. We look forward to continued collaboration with the Parties and other Great Lakes regional stakeholders.

Very truly yours,

COUNCIL OF GREAT LAKES INDUSTRIES

Kathryn A. Buckner, President