



Ontario Federation of Agriculture

Ontario AgriCentre

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July 13, 2016

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The Ontario Federation of Agriculture (OFA) is the voice of Ontario's farmers, representing over 36,000 individual members and 30 affiliated organizations. Farming is the foundation of a robust agri-food system in Ontario contributing healthy foods, a vibrant economic engine and a sustainable eco-system.

As farmers, our members are dependent on access to clean and secure sources of water for plants and livestock. As such, the Great Lakes play a critical role in our food production system. As the largest group of private land-owners in Ontario, farmers are heavily affected by policies and regulations addressing water issues. Consequently OFA carefully reviews any proposed legislation and subsequent regulations that address water issues and how they may impact farming in Ontario.

We are pleased to offer our observations and recommendations on "The Great Lakes Nearshore Framework".

The consultation document refers to the purpose of this framework as "to address ongoing and emerging challenges to the nearshore waters of the Great Lakes, where restoration, protection and prevention activities are critical to improving and sustaining the ecological health of the Great Lakes coastal areas and enhancing attendant social, cultural, recreational and economic benefits." It is essential that this framework recognize the many inter-related aspects of the Great Lakes, and realize that the burden of ensuring this freshwater resource's longevity requires participation by all. The work done under the Nearshore Framework must be integrated with other activities conducted under the Great Lakes Water Quality Agreement.

We are glad to see that this document recognizes the many challenges of managing the nearshore area due to its complexity and highly variable environments. It is paramount that any work or recommendations resulting from this framework be science-based in order for this endeavour to be credible and successful.

A well thought out process has been developed for this Framework. The first step is a Complete Assessment of Nearshore Waters. This is a very large undertaking; sharing of existing data between many jurisdictions and agencies will facilitate the process and be more cost effective than duplicating existing information.

There are some concerns regarding the three phases identified for the comprehensive assessment. It is not clear if or how this framework will address the impact climate change has, or may have, on the ecosystem types of the nearshore areas. This is an important consideration. Also, the proposed work does not include any mention of the impact on water quality from invasive species. This is a significant oversight that must be included to accurately reflect and understand what is actually happening in the nearshore waters. Finally, the second phase speaks to accounting for the impact of nearshore conditions on human uses, but only seems to recognize social and cultural impacts and neglects the economic component.

Section 2 of the Nearshore Framework is “Action”. This includes identifying causes of stress to the nearshore waters. However, identifying the causes of stress can only occur from a complete and robust assessment being completed, and illustrates the importance of considering the impact of invasive species and climate change during the assessment. Another component within Section 2 is “Assist in assessing risk and threats to areas found to be in high quality condition”. The process for assessing these risks and threats must be transparent and well supported. Consideration must also be given to how long an activity may have been taking place in this “high quality condition” area in determining if the activity is actually a risk or threat. For example, an existing, long-standing agricultural operation should not suddenly be deemed a risk or threat to an area that is considered in “high quality condition”.

Additional consideration needs to be given to Table 1: Proposed Physical Variables. This table is somewhat simplified for what are very complicated and intricate systems. For example, it is not accurate to state that Aquatic Vegetation – characterized by the presence/absence of emergent vegetation – indicates wetlands. The presence of emergent vegetation does not and should not be the defining factor of what is or is not a wetland. Additionally, aquatic vegetation is emerging in locations it was not previously present due to the influence of quagga mussels and zebra mussels. Since this appears to be the basis of classification of ecosystem types and habitats which underlies the project, greater consideration into some of these assumptions is required prior to undertaking the project.

Finally, there is no mention in The Great Lakes Nearshore Framework regarding costs and who pays. This is an important oversight that must be considered and open for public discussion.

I trust that our opinions and recommendations will be given due consideration.

Sincerely,



Don McCabe
President