

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 525
May 24, 2017

Ms. Madhu Malhotra, Manager
Ministry of the Environment and Climate Change
40 St. Clair Avenue West
Toronto Ontario
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Dear Ms. Malhotra:

Subject: Canada-Ontario Action Plan for Lake Erie – EBR 012-9971

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 740 member clubs, we have reviewed the Canada-Ontario draft action plan – Partnering in Phosphorus Control: *Achieving Phosphorus Reductions in Lake Erie from Canadian Sources*.

The OFAH supports the development of a Canada-Ontario action plan to reduce algal blooms and excessive nutrient loads in Lake Erie. We agree that actions are needed to reduce the amount of excessive phosphorus entering Lake Erie to help restore and protect the lake's water quality and ecological health.

Many agencies, stakeholders, and other partners have a role in reducing excessive nutrient loadings into Lake Erie. We are pleased to see a commitment from key federal and provincial government agencies to lead the action plan. Successful implementation of an effective action plan goes beyond a single agency. A limitation of the current plan is the lack of a short- and long-term timelines with associated benchmarks to illustrate the success of the plan's implementation. Additionally, it is important that the plan also recognize the many existing non-government partnerships and programs that are taking action to protect and enhance water quality in Lake Erie.

While there is general support for the many actions in the plan, we believe the plan would further benefit from setting priorities for action under each category. In other words, identifying a short list of priority actions designed to directly reduce loadings and deliver optimal benefits to Lake Erie and its watershed.

Furthermore, within each of the actions outlined in the plan lies the need to closely monitor the participation by partners, stakeholders, and agencies to provide a full understanding of what is being achieved in the implementation of this plan. Not only would strategically applying our resources scale down and strengthen collaboration but it will also provide important feedback and identify potential gaps.

Priority actions could include targeting municipal sewage treatment plants, and updating storm water management infrastructure; further restrictions on the application of nutrients during the non-growing season; and protection and restoration of wetlands and riparian habitat in priority watersheds where there are excessive phosphorus loadings.

ONTARIO FEDERATION OF ANGLERS AND HUNTERS

Ms. Madhu Malhotra
May 25, 2017
Page Two

A significant barrier to reducing phosphorus loadings to Lake Erie is the continued loss of wetlands. While we appreciate the actions associated with protecting wetlands, there must be a strengthened commitment to make this a priority action to stop the net loss of wetlands. Furthermore, there is no clear commitment for increasing funding for many of the actions within this plan. The OFAH strongly opposes the diversion of funding from existing programs (e.g. Canada-Ontario Agreement). This plan is a shared responsibility and new opportunities for funding and collaboration must be identified.

In closing, the OFAH recommends a strategic approach to the plan that targets priority actions that will provide the greatest outcomes. We see adaptive management as an important tool for tracking this progress and moving forward with more progressive management approaches for reducing excessive phosphorus loadings in Lake Erie.

We appreciate the opportunity to provide feedback on the action plan and look forward to continuing in our engagement throughout its development and implementation.

Yours in Conservation,



Dawn Sucee
Fish and Wildlife Biologist

DS/gh

cc: OFAH Board of Directors
OFAH Fisheries Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
Tom Brook, OFAH Fisheries Biologist