



February 16, 2007

Carolyn O'Neill  
Ontario Ministry of the Environment  
Manager, Great Lakes Office, Land and Water Policy Branch  
135 St. Clair Avenue West 6<sup>th</sup> Floor  
Toronto, Ontario M4V 1P5 Canada

Dear Ms. O'Neill:

**Re: Renewal of the Canada-Ontario Agreement Respecting the Great Lakes Basin Ecosystem**  
**EBR Registry Number PA07E0001**  
**Submitted by Fax to 416-314-7200**

The Great Lakes and St. Lawrence Cities Initiative (GLSLCI) is a bi-national organization of mayors committed to working together and with other governments and stakeholders for the protection and restoration of the Great Lakes and the St. Lawrence River.

The renewal of the Canada-Ontario Agreement Respecting the Great Lakes Basin Ecosystem is one of the many very important matters concerning the Great Lakes and St. Lawrence River under development at this time in which it is essential that local governments participate as full partners with other governments.

The GLSLCI is taking this opportunity to respond to the EBR posting, however we are very disappointed that municipalities were not given the opportunity to participate in the review and renewal of COA as full partners. The review of COA completed by the Government of Canada and Province of Ontario in the summer of 2007 indicates that municipalities were involved through the same mechanisms as businesses, NGOs and academic institutions. While we understand that there are many stakeholders in COA, municipal governments are on the front lines of Great Lakes issues and are key to identifying problems and implementing solutions with other orders of government.

COA is the foundation for Government of Canada and Province of Ontario cooperation and collaboration on the Great Lakes. It has provided leadership amongst Great Lakes jurisdictions in establishing a management framework through setting a vision and goals. As COA expires on March 22 2007, we are very concerned that Canada and Ontario have

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not given CAO the priority it requires and that there is insufficient time for an effective renewal process. We support many of the proposals for the renewal of COA as noted below but the approach taken to date has not been adequate or appropriate given the importance of the Agreement.

The EBR posting indicates a three year renewal of COA is proposed but does not give any rationale for the change from a 5 year term. We understand that the intention behind the three year term is to provide the opportunity for the subsequent COA Agreement to lead the renewed Canada-US Great Lakes Water Quality Agreement. While we support the logic of this approach, we strongly recommend that it be backed up by a comprehensive review and renewal work program that will provide the time and resources to ensure that the subsequent COA provides the framework necessary to for the partners, including local governments, to move forward to effectively protect and restore the Great Lakes.

The proposal to amend existing or add new annexes is also, in principle, supported. However, the very limited information provided on the EBR about these proposals leaves many questions unanswered about how the COA would address them and how they will be implemented.

Clearly there is a need to update the Agreement with respect to Reducing Harmful New Pollutants. Municipalities are committing significant resources to addressing new pollutants through water and wastewater facilities and storm water treatment. Clearly much more needs to be done to stop these pollutants from entering the water systems in the first place.

Conservation of Biological Diversity is of utmost importance particularly the need to reduce and manage invasive species. Many municipalities are actively involved in habitat restoration and working with conservation authorities to restore plant, wildlife and fish species.

The proposal to promote Sustainable Great Lakes Communities is an opportunity to integrate Great Lakes objectives, policies and programs into the overall approach that the Province is taking through the major initiatives such as the Greenbelt and Places to Grow. Official Plans for municipalities on the Great Lakes and in the basin have recognized and reflected the importance of the resource and the waterfronts to their communities.

Climate change will have enormous implications for the Great Lakes and the communities on the lakes and in the basin. It is essential that COA recognize and address climate change.

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As 75-80% of Ontarians get their drinking water from the Great Lakes, and as the Province of Ontario has made many advances in the protection of drinking water, it is appropriate that COA recognize this important role of the resource.

In addition the GLSLCI recommends that COA also include the following.

- Emphasize the need to make progress on the clean-up of the Areas of Concern and recognize and reflect the important role of municipalities in these efforts.
- Provide for dedicated funding from the Province of Ontario and Government of Canada to supplement the enormous municipal investments in water and wastewater infrastructure particularly for upgrading treatment plants and addressing combined sewer overflows.
- Recognize the need to effectively manage the Great Lakes and St. Lawrence waters by prohibiting inter-intra basin diversions as proposed through the Great Lakes Annex Agreement and the proposed amendments to the Ontario Water Resources Act.

The Province of Ontario and Government of Canada proposals for changes to COA signal the intent to establish a vision for the Great Lakes that extends beyond the shorelines and more effectively integrate the Agreement and Great Lakes policy and programs with other planning, policy and program initiatives. This approach is supported.

We strongly urge Ontario and Canada to provide the time and resources necessary to renew COA effectively. It is essential that the renewal of COA involve municipal governments as full partners in the renewal of this and subsequent COAs and recognize the role of municipalities in the Agreement. The Great Lakes and St. Lawrence Cities Initiative would be please to provide local government participation in the renewal of COA.

Sincerely,

David A. Ullrich  
Executive Director