

2015 Lake Superior  
Lakewide Action and Management Plan – Draft  
Comments

The draft 2015 Lake Superior Lakewide Action and Management Plan is a comprehensive document that assembles in one place a very good description of the resource itself, a characterization of its current status relative to the general objectives of the GLWQA, discussion of the relationship of the LAMP to other Lake Superior plans and strategies, and listing of management actions and projects to be undertaken in the future. It should form the basis for all members of the partnership to proceed with actions over the next five years to protect the resource and further improve it in the future. The following comments are offered in the spirit of what additional elements and adjustments to the plan could improve its effectiveness.

You have a very good group of partnership organizations. Broad stakeholder engagement is essential. Unfortunately, there is not any local government representation. It is our understanding that you are in the process of arranging for that on Lake Superior and the other LAMPs and that should be done promptly.

The executive summary is a very good overview of the LAMP, and provides those who do not have time to go through the entire document an opportunity to get a good sense of what is included. Because the new GLWQA puts a strong emphasis on the “A” in “LAMP,” it is especially good that the highest priority action projects are specifically listed in the executive summary. These should be the focus for implementation of the LAMP.

It is unclear how the Existing Lakewide Objectives set out in part 3.2 of the LAMP relate to the nine General Objectives of the GLWQA and the Specific Objectives, including Lake Ecosystem Objectives and Substance Objectives, called for in the agreement. It appears they break the Lake into 7 geographic areas and say each one should be in a “good ecological condition.” The other two Existing Lakewide Objectives seem to be a little more like Substance objectives and a good measure of “zero release” for the 9 persistent bioaccumulative toxic substances, and “protect” Lake Superior from additional substances of concern. “Protect” is not very specific. It would be better to apply the “zero release” standard to this, as well. The GLWQA does call for “numeric targets” for substance objectives, so that needs to be addressed. Overall, the Lake Ecosystem Objectives and Substance Objectives should relate directly to the General Objectives of the GLWQA. There should be consideration of dropping the Existing Lakewide Objectives because, as an additional set of objectives not clearly related to the General and Specific Objectives call for in the GLWQA, they may cause confusion because there are too many objectives.

The discussion of how Lake Superior ranks relative to the nine General Objectives of the GLWQA provides a good narrative and some specific examples of current conditions in Lake Superior, but there is not a bottom line of whether the objectives are being met, and if not, what it will take to meet them.

What is missing from the General, Lakewide Ecosystem, and Substance Objectives, and the Existing Lakewide Objectives, are the indicators and metrics that will define when the objective has been met. A great deal of work has been done by the parties and the IJC over the past four years to refine the indicators and metrics, and get them to a manageable number whereby one can know if the objectives are being met, and if not, what areas need to be improved to meet the objectives. These indicators need to be incorporated specifically into the LAMP.

In Section 9, there is a good enumeration of management actions and projects. It may not be that significant, but there doesn't seem to be a real difference between the management actions and the projects, other than the projects are identified as "priority." It might be best just to call them "actions" and "priority actions" for the sake of simplicity and clarity.

More significant is that none of the management actions or projects have identified who should have lead and supporting responsibilities to take these actions or in what timeframe they should be taken. In addition, they are very general and need more specificity as to how these actions might be accomplished. The LAMP itself probably does not need to go into all of this detail, but there at least needs to be a process to determine "who will do what by when" with regard to the actions. It is clearly recognized that the actions are funding dependent, and that can be stated as a qualifier in the LAMP. At the same time, much more funding than ever before has been available on the U.S. side over the past 5 years, thanks to the Great Lakes Restoration Initiative, and the impressive results, especially at the AOC's, is evidence of that. It is interesting that specific actions were listed for NGOs and the Public, but not the Parties and their partner governments.

The science and monitoring priorities are a helpful listing of research and monitoring issues that need to be addressed. In addition, the discussion about the Nearshore Framework, Ongoing Science and Research, the Biodiversity Conservation Strategy, and other related documents identifies what is going on with these other efforts. Although there are some links established between these efforts and the LAMP itself, the picture is not as clear as it needs to be.

It seems that all of these strategies, surveys, initiatives, frameworks, research, and other activities might be better incorporated by reference, not in their entirety, into the LAMP itself, in a way that aligns them with the nine General Objectives, the Specific Objectives (Lake Ecosystem and Substance) which, when achieved, help achieve the General Objectives. Then all the actions related to the General and Specific Objectives should be grouped together for each set of objectives. For example, General Objective 7 relating to invasive species should have a Lake Ecosystem Objective related to invasive species (none of the Existing Lakewide Objectives include invasive species) and then all the actions related to invasive species grouped together. In addition, it is very important to spell out the indicators and metrics associated with the general and specific objectives.

In all, the LAMP is a very well developed document, and with some additional specificity, clarity, and alignment can be even better.

