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International Joint Commission
Great Lakes Regional Office
100 Ouellette Avenue, 8th Floor
Windsor, ON, Canada

Northeast-Midwest Institute Comments on the International Joint Commission's *Triennial Assessment of Progress on Great Lakes Water Quality* and the Governments' of the United States and Canada 2016 Progress Report of the Parties

Dear Commissioners,

The Northeast-Midwest Institute (NEMWI) has reviewed the *Triennial Assessment of Progress on Great Lakes Water Quality* and the *2016 Progress Report of the Parties*, and offers comments on two subjects of the documents (Nutrients and Areas of Concern), found below.

Nutrients

As noted by the IJC in the Triennial Assessment of Progress (TAP) report's technical appendix, there is a lack of specificity by the Parties in their commitment to “undertake and share research, monitoring and modeling necessary to establish, report on and assess the management of phosphorus and other nutrients and improve the understanding of relevant issues associated with nutrients and excessive algal blooms.” (ECCC and USEPA, 2016) It is important that the Parties establish specific monitoring goals to help meet specific nutrient reduction goals.

Achievement of phosphorus reduction goals in Lake Erie, especially dissolved reactive phosphorus reduction goals, would benefit from monitoring that meets the following general criteria:

- Targets a variety of watershed scales and loading sources; and
- Occurs at significant frequencies over a period of time such that an adequate number of samples are obtained to detect trends in nutrient concentrations.

In the *2016 Progress Report of the Parties* (PROP), it is stated that in the U.S., there is work being done to expand edge-of-field monitoring. The Northeast-Midwest Institute (NEMWI) looks forward to seeing the results of these efforts, especially combined with existing watershed-level monitoring efforts already being conducted.

As mentioned in the main body of the TAP Report on page 45, the PROP “provides little discussion of declining nutrient levels in the open waters of most of the lakes and no plans are provided to address the issue.” (IJC, 2017) Increasing monitoring to target this issue could help better understand what is causing the nutrient decline.

Areas of Concern

It is important to balance rapid removal of BUIs/delisting of AOCs and ensuring that remedial actions taken at these sites are permanent and robust. Post-delisting monitoring of site conditions should occur at a frequency and for a period of time that is adequate to ensure that recurrence of beneficial use impairments will not occur. Long-term post-delisting monitoring should be designed to ensure that former AOC sites are not degrading.

Annex 1 would benefit from the existence of a Great Lakes Executive Committee Annex Subcommittee. The wider sharing of information, especially between both Parties, may help to develop more effective remediation plans that consider more closely the biogeochemical cycling of the chemical pollutants, which may be more beneficial to the wide variety of physical and chemical conditions present at each AOC site.

A system should be set up to assist the five binational AOCs to better coordinate their actions to more closely follow an ecosystem approach to removing BUIs.

NEMWI strongly supports feedback given to AOCs on their delisting reports as stated on pages 150-151 of the TAP Technical Appendix.

Please feel free to contact us with any questions you may have.

Sincerely,

The Northeast-Midwest Institute