



**ONTARIO
RIVERS
ALLIANCE**

379 Ronka Road
Worthington, ON P0M3H0
LindaH@OntarioRiversAlliance.ca
OntarioRiversAlliance.ca

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Nisha Shirali
Senior Policy Analyst
Ministry of the Environment and Climate Change
Policy and Program Division
Environmental Policy Branch
40 St Clair Avenue West, Floor 10
TORONTO, ON
M4V 1M2
By Email: Nisha.Shirali@Ontario.ca

Re: EBR Registry Number: 013-1817 - Watershed Planning Guidance

Dear Ms. Shirali:

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for several associations, individuals and Indigenous members that have come together to protect, conserve and restore Ontario riverine ecosystems.

The Crombie Panel Report suggested that the Province strengthen protection of water resources throughout the area of the four provincial land use plans, by requiring municipalities that share a watershed to work with one another and with Conservation Authorities (CAs) to develop integrated watershed management plans and sub-watershed plans. This document, Watershed Planning Guidance, falls far short of the Crombie Panel Recommendation 41, and supported by Recommendation 42.

This document does not go far enough to place CAs in a central role of watershed planning and management, or in working collaboratively with other municipalities and planning authorities. The CAs have a mandate to ensure the conservation, restoration and responsible management of Ontario's water, as well as the land and natural habitats; however, municipalities have no such mandate and are more development oriented. It is essential that municipalities are not just using this Watershed Planning Guidance purely for municipal land use planning or a stormwater management tool, but that CAs play a central role, and it is used as an integrated watershed planning and management framework.

We are pleased to see the strong list of principles under which the Watershed Planning Guidance has been framed, to include the precautionary approach, consideration of cumulative effects, ecosystem services, and an ecosystem-based approach to stormwater management.

ORA recommends that this Watershed Planning Guidance be required all across the Province, and is mandated through the Provincial Policy Statement, 2014, as an integral part of every municipality's Official Plan.

"A World of Healthy River Ecosystems"



ORA also supports the Ontario Headwaters Institute submission on this EBR posting.

Thank you for this opportunity to comment.

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance
(705) 866-1677