



**ONTARIO
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John Antoszek,
Water Stewards, MECP
40 St. Clair Avenue West, 9th Floor
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By email to: John.Antoszek@Ontario.ca

Re: ERO 019-4971 – Draft Low Impact Development Stormwater Management Manual

Dear Sirs:

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve and restore riverine ecosystems all across the province. ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally and socially sustainable.

We are pleased to provide feedback on the Draft Low Impact Development Stormwater Management Guidance Manual (Guidance Manual) which aims to encourage municipalities, property owners, planners, developers and others to manage rain where it falls. Protecting our waterways from contaminants, reducing flood risks and increasing our freshwater resilience to climate change is crucial.

The ORA is in full agreement that Low Impact Development (LID) must be a priority in development planning guidance for stormwater management practices and should include innovative green infrastructure such as rain harvesting, rain gardens, green roofs, urban trees and forests, permeable surfaces, ditches, swales, stormwater catchments, and must emphasize the protection of wetlands.

Unfortunately, the Guidance Manual does not contain any mandatory requirements. The document deals with planning, runoff volume control, groundwater considerations, criteria for model selection, climate change considerations, operation and maintenance, and erosion and sediment control during construction. However, it only encourages – it does not require LID. As climate change progresses, it will become increasingly imperative to require these and other measures in stormwater management planning.

Recommendation 1: LID Stormwater Management practices must be made mandatory through regulation and policy.

There have been three Environmental Registry postings for water, stormwater and wastewater management with comments due this month. The ORA has commented on the Subwatershed Planning Guide, Municipal Wastewater and Stormwater Management in Ontario Discussion Paper, and this Guidance Manual. They are all closely related, but slightly different in their guidance. This is the perfect example of how land-use planning in Ontario is inconsistent and ineffective in its approach and fails to apply integrated and effective planning guidance.



LID practices are designed to control and treat precipitation where it falls and must always be informed by Subwatershed and Watershed Planning Guidance to be effective.

Recommendation 2: Public input and recommendations from all three Environmental Registry postings must be fully integrated into the Municipal Wastewater and Stormwater Management in Ontario, the Subwatershed Planning Guide, this Guidance Manual, and the Watershed Planning Guidance document should be reposted for further public consultation.

This LID Planning Guidance document recognizes that watershed planning is an effective tool to ensure that water management solutions are based on an appropriate scale and considers the cumulative effects of urbanization and growth. It also confirms that watershed planning should inform environmentally sound land use and infrastructure decision-making within the context of municipal planning and growth management.

This Guidance Manual encourages an important shift in LID stormwater management practices through better site design and planning in new development and redevelopments. However, it should also recognize the *Great Lakes Protection Act* for its commitment to protecting the waters, habitats and species of the Great Lakes and provides that the *Planning Act* and other land use planning policy decisions must be in conformity with initiatives and policies of the Act. The Subwatershed Planning Guide is also an essential consideration.

Recommendation 3: The Guidance Manual should also recognize the *Great Lakes Protection Act* and Subwatershed Planning Guide in its consideration of the policy for LID.

Land-Use planning must use a watershed and subwatershed-based planning approach if it is to be effective. Conservation Authorities have the expertise and mandate to work with municipalities, regulators and stakeholders to manage Ontario's water resources, and are leaders in LID best management practices.

Recommendation 4: Conservation Authorities must play a key role in educating the public and ensuring LID development best practices in new developments and redevelopments in Ontario.

Climate Change will result in increasing pressure on our freshwater resources and would benefit from frequent reviews and updates of stormwater and watershed policy and guidance.

Recommendation 5: There should be periodic reviews and updates of stormwater and watershed policy and guidance, as well as an evaluation of their effectiveness.

The ORA fully supports the recommendations of the Canadian Environmental Law Association.

Thank you for this opportunity to comment!

Respectfully,

Linda Heron
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