



**ONTARIO
RIVERS
ALLIANCE**

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11 March 2022

Jessica Isaac
Environmental Policy Branch
40 St. Clair Avenue West, 10th Floor
Toronto, ON
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By email to: Jessica.Isaac@Ontario.ca

Re: ERO-019-4978 - Subwatershed Planning Guide

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.

The province is proposing “to update the guidance for integrating watershed and subwatershed planning into land use planning because the 1993 guidance document is out of date”. The draft document “is intended to help promote a more consistent subwatershed planning approach across Ontario, leading to better coordinated and more efficient planning processes”.

The ORA is very supportive of policy and legislation that provides an ecosystem approach for planning at a watershed and subwatershed scale. It is essential that we ensure a healthy environment, with clean and abundant freshwater resources, that helps to provide resilience to the extremes of climate change. We are appreciative of the information webinar on the Subwatershed Planning Guide, and the 45-day comment period.

RECOMMENDATION 1: We recommend that all Environmental Registry postings provide a minimum of 45 days, and preferably 60 days, to provide stakeholders with enough time for thoughtful and meaningful feedback. Information webinars are extremely helpful, and it would be beneficial to stakeholders if they were made a regular part of the consultation process.

Indigenous Partnership:

Overall, we are generally supportive of the draft guidelines as they seem broad ranging and comprehensive. We are especially pleased to see the partnership approach with Indigenous peoples included in the Guide and agree that this approach will lead to a much more comprehensive subwatershed plan.

Climate Change Adaptation:

Watershed planning must play a key role in climate change adaptation, municipal land use and infrastructure planning. Careful and effective watershed planning will help prevent property loss, improve public safety and build resilience into Ontario’s freshwater resources and communities.

“A World of Healthy River Ecosystems”



It is imperative that floodplain and natural hazard limit mapping be conducted, and any other study that would identify potential risks from natural hazards. However, it is crucial that municipalities respect the watershed plan and not make exceptions to allow development in floodplain areas under any circumstances.

RECOMMENDATION 2: That Conservation Authorities (CAs) have the last word over municipalities in regard to development within an identified flood plain area.

RECOMMENDATION 3: Must have a strong focus on mitigation and adaptation to climate change to increase resilience to flood risk.

RECOMMENDATION 4: Include or establish climate models appropriate for the area to support and enhance watershed resilience.

Municipalities without a CA:

There are many watersheds in Ontario not represented by a CA. The principles in this Guide are important in every watershed and subwatershed within the province and must apply to all municipalities.

RECOMMENDATION 5: It be mandatory for all municipalities to create watershed and subwatershed plans based on the principles of this Guide.

RECOMMENDATION 6: That municipalities across the province have the support to seek out the assistance of CAs in the development of their watershed and subwatershed plans.

Thank you for this opportunity to comment!

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance
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