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Re: Watershed Planning Guidance ER Ref# 013-1817

Green Durham Association (GDA) is a not-for-profit charitable organization dedicated to protecting, preserving and enhancing the forests, farmlands and natural areas which lie northeast of Toronto in Uxbridge, north Pickering and adjacent Greenbelt lands. We support healthy habitats for flora, fauna, wetlands and watersheds, the development of trails for passive recreation use, and we are a constructive voice on all issues which may have implications on our vision for these lands. Our goal is to ensure these lands are available for the enjoyment of future generations.

Our roots lie in the expropriation of 40,000 acres of lands in Pickering by Federal and Provincial governments during the 1970's. Over the years our work has evolved to include the protection and stewardship of these lands and adjacent lands which lie on the northeastern fringe of one of the most densely populated areas in North America. GDA has for many years worked in partnership with the Toronto and Region Conservation Authority (TRCA), the Township of Uxbridge and other organizations and groups in adding to conservation land holdings, in the creation of trail and natural heritage linkages connecting conservation lands and communities, and in the stewardship of these lands.

The idea of integrating watershed planning into municipal planning processes is laudable. We commend the Province for adding this approach to planning. We have reviewed the draft document and have several comments which we have listed below. We are a citizen-based group with an interest in planning and land use, rather than an organization which has a direct working knowledge of the complex mixture of acts, politics and authorities governing water and watersheds and our comments reflect this approach:

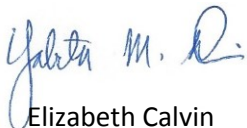
- The highly specialized expertise, historical involvement and mandated duties and authorities of the conservation authorities are not articulated in this document. The document does not make it clear that conservation authorities have the expertise needed to guide the development of a watershed plan. The document states "Management at a watershed scale has traditionally been undertaken by conservation authorities" (page 22) but does not elaborate. The reader is left wondering if conservation authorities still have a role, or no longer have a role. The role needs to be clearly spelled out in this document if it is to provide useful guidance. Conservation

authorities should have a strong role in watershed planning and this needs to be stated clearly throughout the draft document.

- The document states that “Smaller municipalities and conservation authorities may have differing levels of resources and financial support” (p. 22). A mechanism to efficiently share information and expertise for these smaller conservation authorities and municipalities should be included in the draft document. Developing a practice group of watershed practitioners to share information and expertise across the province could be considered, and funding provided to support such a group.
- The draft document leaves the impression that municipalities can undertake watershed planning on their own. For example, on page 22, “...conservation authorities **can** be valuable partners in planning and implementation efforts” and later, “Municipalities can partner with conservation authorities.... **at municipal discretion**”. This is a truly alarming and dangerous prospect. There are immense pressures on municipalities from many interests to develop and build. Municipal bodies are too vulnerable to political and financial influence to safely be handed the sole responsibility for watershed-based planning. Furthermore, as stated above and in the draft document, watershed planning requires a level of expertise and technical knowledge beyond that held by municipalities. Wording should be strengthened to make the expectation clear that municipalities “should” or “must” rather than “may” partner with conservation authorities when undertaking watershed planning.
- The document uses words such as collaboration and coordination to describe processes related to watershed planning. Collaboration is an effective process to develop a plan but when disputes occur, a mechanism needs to be in place to provide the final word. Otherwise there is a risk that watershed planning could become mired in bureaucracy and inertia, thereby discouraging municipalities from truly committing to this approach to planning. The document states: “The Province has a role in reviewing land use planning and infrastructure decisions to ensure they are informed by watershed or sub-watershed planning” (p. 23). There is also a need for the Province to enforce, make rulings and hear appeals. This needs to be much more strongly and clearly stated in the document.

We respectfully suggest that the draft document be re-written to make roles and responsibilities clear and so that it truly provides guidance, and as intended, strengthens requirements for municipalities to incorporate watersheds into planning. We look forward to commenting on the next draft.

Yours truly,



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