

Halton Area Planning Partnership (HAPP)

Watershed Planning Guidance Joint Submission

April 6, 2018



Introduction

The Halton Area Planning Partnership (HAPP) is comprised of Halton Region and the following Local Municipalities: the City of Burlington, the Town of Halton Hills, the Town of Milton, and the Town of Oakville.

This submission represents HAPP's response to the document "Watershed Planning Guidance" which was placed on the Environmental Registry as a Policy Proposal Notice (EBR Registry Number: 013-1817) on February 6, 2018. The Guidance document has been prepared by the Province and is intended to help municipalities in implementing Provincial direction related to watershed planning.

The Halton Area Planning Partnership welcomes this opportunity to have its collective voice heard by responding to the proposed Watershed Planning Guidance document. HAPP's response includes:

1. This letter, which contains general comments regarding the whole of the Guidance document.
2. Appendix 1, which contains in table form comments specific to individual sections of the Guidance document.

Background

The proposed Watershed Planning Guidance primarily supports the implementation of policy amendments made through the Coordinated Plan Review (2017), which includes revisions to the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan, the Niagara Escarpment Plan and the Oak Ridges Moraine Conservation Plan. These policy amendments set stronger requirements for municipalities and other planning authorities to undertake watershed planning to inform key land use planning and infrastructure decisions.

The Watershed Planning Guidance also supports the Provincial Policy Statement, 2014 which requires planning authorities to protect, improve or restore the quality and quantity of water by using the watershed and the subwatershed as the ecologically meaningful scale for integrated and long-term planning.

Watershed planning is an opportunity for municipalities and other planning authorities to work collaboratively towards watershed objectives by creating a framework for the management of human activities, land, water, aquatic life and resources within a watershed, and for the assessment of cumulative, cross-jurisdictional and cross-watershed impacts. The proposed Watershed Planning Guidance contains the following information to assist municipalities and planning authorities in carrying out watershed planning:

- Overview of watershed and subwatershed planning, including policy context, key principles, process and components of a watershed plan.
- Direction on carrying out effective and meaningful engagement.
- Indigenous interests and considerations in watershed planning.
- How to prepare elements of a watershed and subwatershed plan.
- How to use watershed and subwatershed planning to inform land use and infrastructure planning and decision-making.

Key Points of HAPP's Response

1. Scope and Scale

- a) According to the Guidance document, a watershed plan is a broad document that identifies current conditions and challenges, and sets out goals and objectives. Subwatershed plans, typically prepared in support of area-specific secondary plans, are informed by a watershed plan and determine the potential impacts of proposed land use changes. Sections 2.5 and 7.1 provide definitions for both “watershed planning” and “subwatershed planning”, yet the distinction between the two terms is often unclear throughout other sections of the Guidance document (see Appendix I for specific examples). Overlaps in terminology make it difficult to determine the differences in deliverables, level of detail expected, roles and responsibilities, and applicable timelines for watershed plans versus subwatershed plans. The Guidance document should clearly distinguish between the scope and scale of watershed and subwatershed plans, as well as the extent to which land use planning should be “informed by” watershed planning, according to each type of plan.
- b) As noted in section 2.7 of the Guidance document, some municipalities may have a footprint in multiple watersheds or a given watershed might contain all or part of multiple municipalities. Section 2.7 also states that upper and single-tier municipalities and partner organizations in the Greater Golden Horseshoe will need to coordinate watershed planning across jurisdictional boundaries, although it is unclear if municipalities with shared watershed boundaries are expected to develop a joint watershed plan. The Guidance document should maintain flexibility for municipalities to undertake watershed planning for the purposes of delineating a water resource system and scoping future subwatershed plans within their own jurisdictional boundaries, and that the preparation of larger watershed plans should be optional.
- c) Section 6.6 of the Guidance document introduces the process of Cumulative Effects Assessment (CEA), which is a method of assessing how much the environment has changed up until today, and what might occur in the future due to development as well as stressors such as climate change. The implementation of CEA as an integral part of the watershed planning process is generally a welcome addition, since it provides a reliable quantitative method for protection, enhancement or restoration of the quality and quantity of water within the watershed. However, additional details regarding scale, budgeting, timelines and intended use would be beneficial. The Guidance document should also clarify whether the resulting data should be used as a higher level, conceptual decision-making tool (similar to the approach used for Source Water Protection) or if the intent is to evaluate the impacts of individual development applications as a part of the approvals process.
- d) Section 4.2 of the Guidance document directs municipalities to identify water resource systems as part of watershed characterization work. Although there are slight variations across Provincial policies and plans, water resources systems generally include ground water features and areas, surface water features, hydrologic functions, key hydrologic features and areas, and natural heritage features and areas. As delineating these features and functions at a watershed scale may result in unrefined data, municipal data should be used to refine the delineation of water resource systems and natural heritage

systems where appropriate municipal policies are in effect,. For example, section 145(9) of Halton Region's Official Plan contains policies directing local municipalities to conduct refinements at a subwatershed level as part of area-specific planning processes, where applicable.

2. Distinguishing Guidance from Policy

- e) The Guidance document contains several examples of overly prescriptive language that introduces requirements beyond Provincial policy (see Appendix 1 for specific examples). The Growth Plan, 2017 (Section 1.2.3) outlines that, although guidance material may be issued to assist decision-makers with implementing Provincial policies, the information, technical criteria, and approaches outlined in guidance material are meant to support, but not add to or detract from, Provincial policy. It is strongly recommended that the Guidance document be reviewed to remove overly prescriptive language and replace it with more discretionary language to enable flexible application.
- f) The differences between undertaking watershed 'planning' as an informative process versus developing an actual watershed 'plan' should be clarified in terms of deliverables, as well as cross-jurisdictional coordination across spatial and temporal scales. For example, while section 2.1 of the proposed Guidance document indicates that a watershed plan document *can* be produced as the key deliverable of Phase 3, the rest of the document generally refers to the processes of "watershed planning" and "subwatershed planning" (subwatershed planning being a component of watershed planning). Further, neither the Growth Plan nor the Greenbelt Plan reference watershed "plans" as a required deliverable of undertaking watershed "planning". The components/outcomes of "watershed planning" should be outlined in a manner that more clearly communicates that "watershed plans" are only one possible output. The Guidance document should also better distinguish which components link to the Provincial policy conformity requirements contained in section 2.6 and Appendix A.
- g) The Guidance document indicates that the water resource system should be identified through the process of "watershed planning", which mirrors the language of both the Growth Plan, 2017 (section 4.2.1) and the Greenbelt Plan, 2017 (section 3.2.3). As the Guidance document indicates that water resource system mapping can be completed during Phase 1, it should be clarified that the preparation of a watershed plan is not necessary to attain conformity with Provincial policy. To reinforce this distinction, it is strongly recommended that "Water Resource Systems" also be included as a separate section outside of Phases 1 to 3 of watershed plan development (see Appendix 1 for specific suggestions regarding the proposed content of this section). Including this material in a separate section is critical to providing clarity that such systems can be developed without having to complete all phases of watershed/subwatershed plan development; their development can also be informed by watershed planning or other available information.

3. Transition

- h) Section 7.1, Step 3 of the Guidance document indicates that watershed planning should be undertaken alongside official plan reviews and official plan amendments, and section 2.7 states that the Provincial One Window Planning Service will review applicable land use planning decisions (eg. Official Plans and Plans of Subdivision) to ensure that they

have been informed by watershed planning in accordance with the Guidance document. Transition provisions should acknowledge the importance of avoiding delays to ongoing review processes, while maintaining flexibility for municipalities to determine the appropriate timing/sequencing for integrating updated watershed planning requirements (i.e. water resource system mapping) into their official plan review processes

- i) The Growth Plan, 2017 (sections 4.2.1.3) requires that growth allocation and planning for water, wastewater, and stormwater infrastructure be informed by applicable watershed planning, and that planning for designated greenfield areas be informed by a subwatershed plan or equivalent. As the complexity and scale of watershed planning exercises for established settlement areas can vary significantly from those in greenfield areas, the Guidance document should clarify if there are triggers for the initiation/updating of studies/plans, content, process and baseline standards for both scenarios. Transition provisions should acknowledge the importance of avoiding delays to ongoing studies, while also clarifying how existing watershed plans (e.g. Bronte Creek, Sixteen Mile Creek, etc.) should be revised/scoped to reflect/accommodate redevelopment and intensification within established settlement areas. This guidance would enable more effective scoping of municipal review processes.

4. Funding

- j) The Guidance document represents a substantial expansion to municipal responsibilities and introduces additional complexities pertaining to watershed planning processes. Implementation of updated Provincial requirements will likely to require additional staff and financial resources to support long term planning studies in coordination with conservation authorities, local municipalities and municipalities sharing watershed boundaries. Monitoring processes for adaptive management requirements will also require long term funding. It is recommended that the Province commit funding to support municipalities in managing the additional costs to implement new watershed planning guidance.

5. Document Structure

- k) Due to the length and complexity of the Guidance document, it is challenging to distinguish technical content from general background information. Usability would be improved if Phases 1 through 3 in the document were contained in a succinct technical guide with illustrated process flow charts summarizing each phase.
- l) Background information outlining higher level concepts would be better contained in a separate yet complementary document or appendix (the Natural Heritage Reference Manual is a good example of this structure), along with additional case studies demonstrating best practice examples of implementation.
- m) Continuation of section number references on each page (e.g. sidebar) would also make it easier to navigate the Guidance document.

Conclusion

HAPP supports the Province's goals and objectives related to the protection of water resources and the need for watershed planning to inform land use planning. Although there is a long history of undertaking watershed planning in Halton Region, HAPP recognizes that the degree to which municipalities undertake watershed planning varies across the Province.

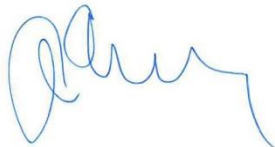
HAPP also recognizes that the purpose of the Guidance document is to aid municipalities and other planning authorities in fulfilling Provincial land use planning requirements, as it relates to watershed planning. To ensure effective implementation of Provincial direction, the Guidance document should concisely distinguish the scale, scope and deliverables of watershed planning/subwatershed planning and watershed plans/subwatershed plans, while also providing specific transition timelines to ensure that new requirements do not negatively impact ongoing projects. It should also be explicit that the Guidance document is a support tool, and should not introduce additional requirements beyond Provincial policy. HAPP recommends that additional consultation regarding the proposed Watershed Planning Guidance be undertaken, to ensure that the document fully reflects practical municipal input.

Thank you for providing the Region and its local municipalities the opportunity to comment on this important implementation tool for the 2017 Provincial land use plans. We welcome the opportunity to have further discussions with Provincial staff to address our recommendations prior to the release of the final Guidance document.

Respectfully submitted,



Curt Benson, MCIP, RPP
Director of Planning Services &
Chief Planning Official
Halton Region



John Linhardt, MCIP, RPP
Commissioner of Planning & Sustainability
Town of Halton Hills



Mark H. Simeoni, MCIP, RPP
Director of Planning Services
Town of Oakville



Bill Janssen, MCIP, RPP
Interim Director and Chief Planner
Department of City Building
City of Burlington



Barb Koopmans, MCIP, RPP
Commissioner of Planning & Development
Town of Milton

Watershed Planning Guidance – Draft Document Review

APPENDIX 1

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
Introduction		
1 How to Read This Document	<i>Not applicable</i>	Section 1 should incorporate additional content mirroring the “How to Read this Plan” component of Provincial Plans such as the Growth Plan, 2017 (section 1.2.3) to clarify the relationship between the Guidance document and the Provincial policy requirements outlined in section 2.6 and Appendix A. This addition would help to clarify, at the outset of the document, that guidelines are a support tool only and are not intended to introduce new policy requirements.
2 Introduction	<i>Not applicable</i>	<i>No comment</i>
2.1 Watershed Planning Process	<i>Not applicable</i>	<p>a) The definition of watershed planning should be in alignment with the definition contained in the Growth Plan, 2017.</p> <p>c) It would be beneficial to consider adding a principle relating to the repurposing of existing background data wherever possible to facilitate more cost efficient watershed planning and avoidance of unwarranted, resource intensive and time consuming additional studies.</p> <p>d) The Phase 2 work will essentially form the assessment of impacts and management of natural resources. Determining “cumulative effects” is listed as an outcome of this work. It should be recognized that the results (or “cumulative effects”) could appear much different between a watershed and subwatershed study. The Guidance document should be specific as to how impact should be assessed and which</p>

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
		<p>targets are critical at a watershed versus subwatershed scale.</p> <p>e) The guidance document suggests that past studies represent “work already completed” in the context of a new watershed/subwatershed plan. However, it should be recognized that various studies within the same watershed/subwatershed may have used slightly different assumptions and assessment tools. When undertaking a new watershed plan, in the context of the Guidance document, it should be recognized that additional work may be required to integrate “work already completed” with new assessments, with a reliance on the comprehensive assessments of impacts to base management decisions.</p>
2.2 Principles	<i>Not applicable</i>	<i>No comment</i>
2.3 Brief History of Watershed Planning in Ontario	<i>Not applicable</i>	<i>No comment</i>
2.4 Current Framework	<i>“The approval framework for watershed planning and subwatershed plans has not changed as a result of the Coordinated Land Use Planning Review.”</i>	<p>a) Suggested modification:</p> <p><i>“The approval framework for watershed plans and subwatershed plans has not changed as a result of the Coordinated Land Use Planning Review.”</i></p> <p>This modification is suggested to maintain consistency in terminology, and because there is no approval framework for the <u>process</u> of watershed planning.</p> <p>b) The Guidance document should outline the current</p>

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
		municipal approval framework for watershed planning [plans] and subwatershed plans.
2.5 Definitions of Watershed Planning	<i>Not applicable</i>	<p>“Watershed planning” is the process through watershed and subwatershed plans are developed, each containing a different level of scale and detail. Subwatershed plans are therefore understood as being developed through “watershed planning”, yet the undefined term “subwatershed planning” has been introduced, causing some confusion. The term “subwatershed planning” should be removed and replaced with “watershed planning” throughout the Guidance document, for consistency with Provincial definitions for watershed planning, watershed plans and subwatershed plans.</p> <p>The elements listed in the definition of “watershed planning” are those that are <u>typically</u> included in watershed planning; they should not be considered required elements.</p> <p>Notwithstanding this distinction, Section 2.6 of the Guidance includes a table under the heading “Checklists for meeting Provincial Policy Requirements”. It is not appropriate to present the typical elements contained within such a study as actual study requirements through a guidance document.</p>
2.6 Summary of Policy Requirements	<i>Not applicable</i>	<i>No comment</i>
2.7 Roles & Coordination	<i>Not applicable</i>	It may be beneficial to include a figure illustrating the roles and responsibilities of each participant as they relate to Phases 1 to 3 of watershed planning and their ultimate approval and implementation.

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
2.8 Equivalency & Transition Provisions	<p>a) <i>“Municipalities and planning authorities should assess the components of watershed planning that are outlined in this section and determine whether the assessments and studies they currently have would meet the components required under each plan. If not, then the assessments and studies need to be updated accordingly.”</i></p> <p>b) <i>“While developing a watershed or subwatershed plan, municipalities and planning authorities can use equivalent studies to inform their planning and decision- making.”</i></p> <p>c) <i>“At its core, an equivalent study to watershed planning will need to.”</i></p>	<p>a) Transitional timelines should ensure that ongoing watershed/subwatershed plans are not impacted, as re-evaluating studies currently underway may result in new study requirements and possible approval delays.</p> <p>b) Considering that sub-watershed plans are typically development driven and do not always align with the boundaries of a singular drainage area, additional criteria and case studies relating to equivalent studies should be provided.</p> <p>c) This choice of language removes the flexibility intended in associated policy. It is recommended that the term “need” be replaced with “may” or “should”.</p>
3 Engagement and Indigenous Perspectives	<i>Not applicable</i>	For consistency with section 7.2, section 3 should address alignment between watershed planning and the Class Environmental Assessment process, in relation to engagement.
3.1 Effective Engagement & Committees	<i>Not applicable</i>	<i>No comment</i>
3.2 Partnering with Indigenous Communities	<i>Not applicable</i>	<i>No comment</i>

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
4 Watershed Delineation and Characterization	<i>Not applicable</i>	<i>No comment</i>
4.1 Delineation of Watersheds & Subwatersheds for Land Use Planning	<i>Not applicable</i>	<i>No comment</i>
4.2 Identification of the Water Resource System	a) <i>"With key features identified, there is now a need to determine functions and linkages within the system."</i>	<p>a) Suggested modification:</p> <p><i>"With key features identified, there is now a need to determine functions and interrelationships within the system."</i></p> <p>This modification is suggested to maintain consistency in terminology, as the title of this section uses the term "functions and interrelationships".</p> <p>b) The Guidance document should specifically reference municipal natural heritage system mapping, where available, as a source of information under Step 4 "Watershed Information Sources".</p> <p>c) The Guidance document should include flexibility regarding the equivalency criteria and water resource system components outlined in section 2.8, to acknowledge the limitations faced in existing serviced settlement areas and/or areas without proposed development activity to trigger a study or review.</p> <p>d) While some aspects of Halton Region's water resource system can be delineated based on existing data (e.g. key</p>

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
		<p>hydrologic features), others would require new or additional mapping (e.g. key hydrologic areas). The Guidance document should specify whether such mapping is to be conducted as part of the development of a watershed plan, or through watershed planning generally (i.e. subwatershed plan or secondary plan processes).</p> <p>e) The Guidance document should elaborate on the relationship of the water resource system to other systems that the Province has directed municipalities to identify (e.g. natural heritage and agricultural) in terms of mapping and policy application. A figure illustrating the various components of the water resource system and how to map areas of overlap (particularly in terms of the natural heritage system) would provide clarity in this regard.</p> <p>f) To better guide the identification the water resource system outside of watershed plan development, it is recommended that the Guidance document include additional direction in a separate section. This section should elaborate on the actual policy requirements relating to water resource system development (including that elements listed in the definition are typical and not necessarily required in all instances), list the various components features and areas to be incorporated within such systems, identify the data sources for these components and describe how they can be developed under multiple scenarios (1 – through watershed/subwatershed plan development , 2 – informed by watershed/subwatershed planning, and 3 – using other available information).</p>
4.3 Characterization of	a) <i>“Monitoring the watershed (e.g., in</i>	a) Additional detail should be provided to explain which

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
Existing Conditions	<p><i>activities such as monitoring amphibians and participating in bird census) helps to build stewardship.”</i></p> <p>b) c) <i>“Five years of pre-development monitoring is appropriate to achieve a baseline condition;”</i></p>	<p>aspects of watershed monitoring build stewardship and at what levels.</p> <p>b) The Guidance document should avoid the use of language that could be interpreted as prescriptive language, for example “is appropriate”.</p> <p>c) For single and upper-tier municipalities to achieve conformity with the 2017 Provincial plans by 2022, pre-development monitoring would have had to commence in 2017. Additional guidance regarding transition provisions is required in this regard.</p>
5 Setting the Vision, Goals, Objectives & Targets	<i>Not applicable</i>	<i>No comment</i>
6 Watershed Planning Elements & Best Practices	<i>Not applicable</i>	<i>No comment</i>
6.1 Water Quantity, Water Budget, & Water Conservation Plans	<i>Not applicable</i>	Section 6 is focused on Phase 2 activities, yet section 6.1 makes reference to preparing a water conservation plan, components of which are also carried during in Phase 3 (Implementation). This is an example of how the activities/studies listed throughout the Guidance document are not clearly and consistently linked to each of the Phases (1-3).
6.2 Water Quality & Nutrient Load Assessment	<i>Not applicable</i>	Discussion related to Source Water Protection and the development of Risk Management Plans by municipalities is provided on page 66. The following text is included in this section: <i>“Municipalities are required to develop risk management plans for chloride and pathogens in identified</i>

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
		<p><i>vulnerable areas for Source Protection Planning.</i>”. Further detail on other water quality threats (e.g., sewage systems, agricultural and non-agricultural source material) that may be the subject of risk management plans and also relevant to water quality characterization and assessment through watershed studies would be helpful. For the sake of clarity, the text could also note that chloride, pathogens, and other threats are evaluated against quantities and vulnerability scores before it is determined that a Risk Management Plan is required.</p> <p>Discussion related to best management practices for road salt application by municipalities is provided on page 66. The following text is included in this section: “<i>Municipalities should continue to proactively manage the use of chloride in the watershed by following ECCC’s Code of Practice for the Environmental Management of Road Salt, participating in programs like “Smart about Salt” and promoting salt and water efficient water softeners.</i>”. The discussion of particular road salt management practices in this section under the heading of Source Water Protection may be confusing to the reader as specific management practices for road salt are not specified in the Clean Water Act, 2006. It is recommended that the discussion of road salt management be moved elsewhere in this section under the heading of “<i>What Is It?</i>”</p>
6.3 Natural Hazards in Watershed Planning & Subwatershed Plans	<i>“The policies generally direct development outside of particular hazardous lands, such as adjacent to rivers, streams and small inland lake systems impacted by flooding</i>	a) Section 6.3 indicates that development should generally be directed away from hazards, but also includes discussion surrounding measures for mitigation. The Guidance document should provide additional detail the types of scenarios where mitigation would be an appropriate consideration.

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
	<p><i>and/or erosion hazards (PPS 3.1.1), and also restrict development and site alteration in defined hazards areas, such as the dynamic beach hazard and a floodway (PPS 3.1.2)."</i></p> <p><i>"By understanding the function and susceptibility of various river, stream, and lake systems to disturbance, the potential impacts of proposed developments or remedial measures can be identified, and methods of reducing these impacts through design changes or mitigative measures can be implemented. This can involve inclusion of measures to enhance the overall health of the watershed in relation to mitigating risks due to natural hazards."</i></p>	<p>b) Section 6.3 discusses hazards related to erosion and flooding but does not address other hazards such as wildlands fire. The Guidance document should reflect that subwatershed studies identify all constraints and hazards, which goes beyond water resources.</p>
<p>6.4 Climate Change & Watershed Management</p>	<p><i>Not applicable</i></p>	<p>Section 6.4 should provide tangible direction regarding the integration of climate change and watershed/subwatershed planning exercises. Although the introduction discusses the distinction between mitigation and adaptation, the methodology does not clearly distinguish between the two. Recommended additions are as follows:</p> <p><u>Mitigation</u>: Conduct a GHG emission modelling/inventory exercise for potential land development scenarios and prioritize scenarios with lower GHG emission profiles.</p>

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
		<p><u>Adaptation</u>: Complete a GHG modelling exercise to produce a future outlook for climate change and identify priority climate impacts facing the watershed/subwatershed (i.e. those that produce major adverse impacts and have a high probability of occurrence). Prioritize scenarios with lower climate impacts.</p> <p><u>Integration</u>: Integrate findings from mitigation and adaptation exercises into one or more “climate ready” development scenarios and evaluate them against other economic, social and environmental considerations.</p>
<p>6.5 Connections to Natural Systems</p>	<p>a) <i>“In the Performance Indicators for the Growth Plan, these features were considered as indicators to assess performance in relation to minimum guidelines for watershed coverage outlined by ECCC...”</i></p> <p><i>“The targets outlined in HMHE? could form the basis for developing goals and targets in local watershed plans and subwatershed plans.”</i></p> <p>b) <i>“Criteria for identification of core and linkage areas are provided in Development of the Regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe, building on the NHRM and HMHE?”</i></p>	<p>a) It is not clear which Performance Indicators the Guidance document is referencing, as the Performance Indicators for the Growth Plan, 2017 have not yet been released or circulated for comment, to HAPP’s knowledge.</p> <p>Further, the Guidance document should indicate how these performance indicators would link to the targets outlined in How Much Habitat is Enough.</p> <p>b) This section should also state that municipal criteria may also exist and should be considered as appropriate.</p> <p>c) Both Phase 1 and 2 indicate that connections to natural heritage systems should be identified. The Guidance document should be streamlined to eliminate repetition of actions across phases.</p>

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
6.6 Cumulative Effects Assessment	<p>a) <i>“The Ministry of the Environment and Climate Change Permit to Take Water program takes cumulative effects into account when decisions are made on permitted water takings. The program follows a set of six principles, of which cumulative effects is Principle 4: The Ministry will consider the cumulative impacts of water takings.”</i></p> <p>b) <i>“The credibility of a watershed plan is dependent upon its approach to CEA. Many believe that CEA is an overwhelming and unrealistic task to complete. This however, is based on an assumption that CEA involves monitoring and assessment of everything, everywhere all of the time. CEA can be directed, focused and adaptively managed to key indicators and risks within a watershed.”</i></p> <p>c) <i>“The way this Watershed Planning Guidance is structured might suggest CEA is something independent of the other sections of this guidance document. In fact, CEA is the integrator of all of it.”</i></p> <p>d) <i>“Step1: This component of CEA</i></p>	<p>a) Based on experience within Halton Region, MOECC considers CEA in the area surrounding the PTTW property through studies conducted by consultants on behalf of the applicant. These studies do not take into account the cumulative impact on the watershed or subwatershed as a whole. As such, it is not clear how this approach can be expanded to the watershed scale. Any predictive model, CEM method or DSS used by the ministry in the PTTW process that could be used for watershed planning should be included in the guidance document.</p> <p>b) Current studies conducted through development driven secondary plan process, consider key indicators relevant to land use change. It is unclear whether they would be considered equivalent CEAs, or a building block of a watershed scale CEA.</p> <p>c) Based on the current structure of the Guidance document, CEA does appear to be an independent element in the watershed planning process. The Guidance document should be restructured to demonstrate how different elements in each phase of the watershed planning process are interrelated with CEA. An example of CEA done through the watershed planning process would be very helpful.</p> <p>d) The definition of boundaries for CEA seems to allow for different scales than of that discussed in the rest of the Guidance document. As such it is unclear whether the CEA requirement applies to the entire watershed plan area.</p> <p>e) The Guidance document highlights an issue regarding the</p>

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
	<p><i>begins with defining the boundaries of the study area for the assessment. These boundaries are application specific and can be political or administrative, watershed, or regional. In the context of watershed planning by municipalities, one would assume that the boundary would be the watershed (as delineated in the early steps of watershed planning). However, depending upon the question or the development pressures, boundaries of a CEA could be at a sub-watershed scale or could also include multiple jurisdictions depending upon the watershed size.”</i></p> <p><i>e) “It has been discussed in the literature of who should be responsible for development of such a system. Industry for example, has raised the issue in the literature a number of times indicating how difficult, expensive and unrealistic it is for project proponents to carry the burden of assessing their project application relative to cumulative effects where they are required to conduct regional CEA as a single project proponent. The jurisdictional complexity in Canada also makes it</i></p>	<p>reported challenges faced by industry in undertaking CEAs and provides a series of recommendations. More clarification is required on how municipalities can work with the private sector to accomplish these recommendations and/or what role the Province could play to facilitate these interactions.</p>

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
	<i>difficult for a single government agency to implement and manage the DSS tools."</i>	
6.7 Assessment of Land Use & Management Scenarios	<i>Not applicable</i>	<i>No comment</i>
7 Implementation	<i>Not applicable</i>	<i>No comment</i>
7.1 Watershed Plan & Subwatershed Plan Development	<i>Not applicable</i>	<i>No comment</i>
7.2 Informing Land Use Planning & Integrated Planning for Water, Wastewater & Stormwater	<p><i>"Municipalities and watershed practitioners interested in harmonizing the subwatershed and EA planning processes should review the current EA requirements for the types of projects that could be anticipated as a result of subwatershed planning, and integrate climate change considerations into EA processes."</i></p> <p><i>"Ongoing monitoring during implementation and adaptive management will help to determine if planning, design, and development restrictions are successful in protection of water and management of land uses and resources."</i></p>	<p>Discussion related to the Environmental Assessment Act and the Municipal Class Environmental Assessment (MCEA) process is provided on pages 118 and 119. More clarification is required regarding what is meant by the term "<i>harmonizing</i>", and specifically how subwatershed plans are intended to inform and serve as inputs to EAs, or vice versa.</p> <p>Discussion related to ongoing monitoring during plan implementation is provided on pages 117 and 118. What is the scope of this monitoring, and would it be in addition to the area-specific recommendations for monitoring typically included in Subwatershed Plans? Who would be responsible for coordinating and executing monitoring programs? More detail regarding the scope and nature of proposed monitoring to support plan implementation is required in this section and throughout the document.</p>

Guidance Document Section Reference	Guidance Document Text Reference	HAPP Comments
7.3 Implementing The Plans Beyond Municipal Policy & Land Use Decision-Making	<i>Not applicable</i>	<i>No comment</i>
8 Monitoring & Adaptive Management	<i>Not applicable</i>	Watershed plans typically lack robust ‘contingency’ provisions requiring area-specific corrective responses or additional management actions post development. For example, if monitoring data indicates that stream temperature has increased as a result of development, rather than adding infiltration trenches to cool runoff, such measures are usually only applied to future development scenarios. The Guidance document should be clear on the expectations and implications of adaptive management by specifying minimum data standards and recommending provisions for additional measures that may be required post-development, established through the development approvals process.
9 Resources	<i>Not applicable</i>	As currently formatted, this section constitutes a reference list for the sources used to prepare the Guidance document. To be functional as a “resource” section, the contents should either be organized by theme or provided as an annotated bibliography.
10 Abbreviated Terms	<i>Not applicable</i>	<i>No comment</i>
11 Appendix A	<i>Not applicable</i>	<i>No comment</i>