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HEALTHY COMMUNITIES • SUSTAINABLE COMMUNITIES

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Environmental Policy Branch  
Ministry of the Environment and Climate Change  
40 St. Clair Avenue West, 10<sup>th</sup> floor  
Toronto, Ontario  
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**Re: Draft Watershed Planning Guidance Document  
EBR Registry Number: 013-1817**

Dear Nisha,

The Ontario Professional Planners Institute (OPPI) is the recognized voice of the Province's planning profession. Our almost 4,500 members work in government, private practice, community agencies, academic institutions and not-for-profit agencies in a variety of specialties across Ontario. Our members meet practice requirements and are accountable to OPPI and the public to practice ethically and to abide by a Professional Code of Practice. Only Full Members are authorized by the *Ontario Professional Planners Institute Act, 1994*, to use the title "Registered Professional Planner" ("RPP").

On behalf of the Ontario Professional Planners Institute, I am submitting our response to the Province's draft Watershed Planning Guidance Document. Our response affirms the importance we place on this Guidance Document that will materially assist everyone involved in the planning process to better fulfil the watershed planning requirements of the Provincial Policy Statement and the Provincial plans.

The process as outlined in the Guidance Document adds a further layer of complexity to municipal planning, particularly in the Greater Golden Horseshoe. We believe the general approach that municipalities should be in the lead role, is the correct one.

However, the fact that watershed boundaries do not coincide with municipal boundaries, and that many other stakeholders (especially conservation and source protection authorities) have done considerable work already, dictate that the process should be kept as simple as possible, should be scoped to incorporate existing work and avoid replication, and should be designed to mesh most efficiently with other broad planning requirements such as Municipal Comprehensive Reviews (MCR).

We would like to highlight the following priorities for improving the Guidance Document, so it will best assist planning practitioners and stakeholders:

- While great emphasis has rightly been placed on the relationship of this document to Provincial plan requirements, watershed planning is a Province-wide requirement. The document should clearly set out for planners and participants what they specifically need to do in relation to where they are located in Ontario

- The importance of the relationship between watershed planning and MCR has been better acknowledged in the workshop summary and Q&A documents released from recent webinars. Ideally, the guideline for the preparation of MCRs that has also recently been initiated, should have been prepared concurrently and harmonized with the present guidance document. Best efforts must be made to ensure the present document acknowledges that one of, if not the, most important purposes of watershed planning is to inform and provide input to MCRs and their outside Greater Golden Horseshoe equivalents. The document must aim for a seamless and efficient translation of watershed plan products into comprehensive reviews
- The roles of various stakeholders need to be more clearly identified. A stronger and clearer role for conservation authorities in particular is not inconsistent with municipal leadership and full municipal acquittal of their policy and planning responsibilities
- Clearer differentiation is needed between the purposes of, and requirements for, watershed planning at various levels/stream orders: watersheds, subwatersheds, and catchments. The extremely simplistic [1993 Water Management on a Watershed Basis](#) trilogy succeeded better at that than the current draft document does
- Rigorous cost-benefit analysis should be given more prominence as it is essential for the evaluation of alternative land use scenarios, which the draft document rightly focuses on as a key element of watershed planning. Practitioners need to be given the methodologies and tools to assist them with their work
- The "final" version of the document that the Government intends to release shortly should not be viewed as final. The importance of properly integrating watershed planning with comprehensive review only underlines that. The document to be released shortly should be clearly identified as "preliminary", "version 1", or other similar naming, with a clear commitment that it will be revised and reissued within a specified period of time (for example, two years) based on the experience and feedback of practitioners and decision-makers

Should you have any questions regarding our submission, please feel free to contact me at 416-483-1873 or by email at [executivedirector@ontarioplanners.ca](mailto:executivedirector@ontarioplanners.ca).

Sincerely,



Mary Ann Rangam  
Executive Director  
Ontario Professional Planners Institute