



The Ontario Headwaters Institute

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CVC
PDF via e-mail

Please accept these limited notes, due to the short timeframe for comments on a massive project that has been exigent for some time with limited NGO input, on municipal water sustainability plans, as required under the Water Opportunities Act.

Over-arching Comments

As expressed previously, the OHI supports the development of municipal water sustainability plans. We find, however, as will be seen below, layers of confusion around terminology, with inexplicable exclusions of key watershed management characteristics and pressures, such as the need for municipalities to preserve and protect forests, wetlands, and small streams, as fundamental features of municipal water management.

In addition, as expressed in an earlier e-mail, we find the lack of a clear understanding of the framework for public engagement disturbing, and have requested clarification on either an expanded timeframe for project delivery by CVC and/or a clear indication from MOECC of next steps in a more robust consultation process.

We offer additional comments in the sections below.

Terminology

The Water Opportunities Act is quite clear, calling for municipal water sustainability plans. Rather than clearly labelling these to be the object of this exercise, and while almost never mentioning the two most prevalent water management concepts – Integrated Water Resource Management and Watershed Management - numerous white papers and other documents refer to a bevy of bizarre, conflicting, and prescribed notions instead of consistently using the term “municipal water sustainability plans”.

In addition, and while the OHI supports the development of municipal water sustainability plans, the project seems to have virtually ignored other element required by the Act. These include:

- Aspects of water security based on the protection of forests, wetlands, and small streams; and,
- A water conservation plan.

We do not oppose efforts to better guide the management of municipal drinking water, storm water, and waste water. The material offered to date, however, lacks the context to efficiently and effectively deliver water for anything more than a short-term focus on water for humans in cities, at the expense of the need to protect whole watersheds and biodiversity, while also ignoring Ontario’s regional and bi-national pledges for water conservation.

The White Papers

Limited time from the webinar to the deadline for submission of these comments led to a cursory read of the White Papers.

While several papers distill excellent information, the use of multiple terms that allude to parts of municipal water sustainability plans, and/or that ignore the broader context of water security, auger against the papers presenting a coherent whole. Comments on individual papers, noted by their number and not title, include:

Paper 1 - Seems very focused on expenditures for municipal water management and not water quality, with no real discussion of municipal impact on downstream water temperatures, the design criteria of stormwater ponds (quantity, quality, combined, and for what level of treatment), nor their mid-term post construction effectiveness;

Paper 3 - Acknowledges the existence of silos and the model of conservation authorities (CAs) but does not make any practical suggestions for improved management frameworks;

Paper 5 - More observations about CAs with some analysis. The OHI believes the simpler approach is for Ontario to require planning authorities to implement section 2.2.1 a of the Provincial Policy Statement;

Paper 6 – Introduces the most new, undefined, prescribed terms to avoid “municipal water sustainability plans”;

Paper 8 – Ignores both upstream natural heritage protection to maintain historic flows and municipal liability for both pond maintenance and post-construction monitoring;

Paper 9 – No mention of the first and one of the most effective watershed initiatives in the world to protect drinking water: New York City’s upstate program, primarily with farmers; and,

Paper 10 – Question 11 of great interest on an issue generally ignored in the Papers.

In summary, the White Papers:

- Introduce a myriad of terms that obfuscate “municipal water sustainability plans”;
- Underplay the importance of setting municipal water in a watershed context;
- Cheery-pick water aspects, such as quantity and price over quality and temperature;
- Ignore water conservation; and,
- Under-evaluate the potential of applying the model of CAs to municipal water sustainability plans.

We also have to admit to some head-scratching. While the papers do provide some interesting background for certain aspects of municipal water sustainability plans, on the whole they represent an intellectualization of issues that we believe can, in many instances, be more easily addressed by appropriate policy commitments from the most senior levels of municipal management to mandate better cross-department communication and collaboration.

The Webinar PowerPoint

Following the first 27 slides, many underscoring the project's focus on drinking, storm, and waste water, slides 28 and 29 suddenly introduce the watershed as a component of sound municipal water sustainability plan delivery.

We believe that watershed management, including forest, natural heritage, wetland, small stream, and aquatic species protection, is fundamental to municipal water sustainability plans, and that the project needs a significant re-orientation in that direction.

Outreach

This project lacks any meaningful outreach to community organizations, including the conducting of webinars in late August with a deadline for comments within ten days.

An attempt was made in late August via a request to the OHI to identify community groups for a further webinar with NGOs, but we declined to cooperate, as expressed below:

Seeking more input from NGOs might be a good idea.

However, I need a better understanding of the engagement framework before I help impose short deadlines for an unreasonable volume of work on some colleagues to justify a process for which I have limited context. For that reason, and those below, I am copying ----- as I think this needs some TLC.

Overall, it would be helpful to have a better understanding of 2 aspects of this project:

- 1. You have indicated to me that responses were due around ten days after last Tuesday, with a draft report to MECC due Sept 30, and a final report based on MECC's comments / requests to you due back to them by Dec 31. Am not sure if you are extending the Sept 8/9/10 deadline and/or what will happen when you get your comments back from MECC, but feel context is important to provide opportunities for NGO input to CVC; and,*
- 2. I have left a message with MECC, with the department that "thinks" this is their project but are not sure as "someone" is on vacation. My message sought clarification about what MECC will do with the reports. IE – will they conduct more fulsome public consultation, either after Sept 30 or after Dec 31, or are they merely anticipating a posting to the ER, no meetings, and a decision notice after a short posting period or even just issuing the guidance document?*

My sense is that either we need a revised timeframe for NGO input now and/or some sense of if how and what MECC's next steps will be.

We did not receive a response to our e-mail.

Implementation

If, as we suggest, municipal water sustainability plans must be delivered on a watershed basis, practical suggestions for the involvement of CAs must be developed and discussed.

The OHI further notes a possible, constructive role for Source Protection Committees (SPCs).

Our understanding is that most SPCs have been extra-ordinarily helpful in focusing representatives from multiple sectors on common, multi-barrier protections for drinking water, and that in the near future SPCs will only have one annual duty: to approve reports from Source Protection Authorities.

Rather than discard existing cross-organizational familiarity and goodwill, the OHI believes that SPCs should be transitioned into Regional Water Bodies. Such an effort could address the need for a layer of insight / oversight for numerous programs that the OHI feels are not adequately resourced, including Permits to Take Water, Ontario's Low Water Response Plan, annual water quality and quantity reports, gaps between various agencies, funding shortfalls, and water conservation.

Especially at a time when the Conservation Authorities Act is under review, we urge CVC and MOECC to envision a broader, more effective framework for watershed management, including how it can be applied to municipal water sustainability plans, rather than a piecemeal approach.

For clarification of any of the points raised above, please contact the undersigned at your convenience

Sincerely,

Andrew

Andrew McCammon
Executive Director

cc Selected MPPS, agency personnel, and community organizations