

Ontario Headwaters Institute

October 8, 2009

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Ministry of Natural Resources
Natural Resource Management Division
Lands and Waters Branch
Water Resources Section
300 Water Street
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**RE: EBR Registry # 010-7477
Ontario's Low Water Response**

The Ontario Headwaters Institute (OHI) applauds the Government of Ontario for its initiative to update the Low Water Response plan.

We think the proposed amendments will be helpful in clarifying numerous roles and responsibilities. These include increased support from MNR and MOE for data collection and decision-making for the assignment of levels to low water conditions, and for the broad commitment in sections 1.1 and 4.6 to add Integrated Watershed Management (IWM) as a strategy for long-term management of supply and demand.

In general terms, however, we think the document and the policy framework it represents do not fully demonstrate the ecosystem approach to which the province has committed in several other documents, such as the Great Lakes Water Quality Agreement.

The first sentence of the document, for example (Context; Item 1; page 1), puts the economy ahead of environmental well being. This is augmented by several instances throughout the document where wording appears to indicate that socio-economic considerations trump environmental imperatives.

The OHI urges the government of Ontario to acknowledge the environment as the foundation of our quality of life and to implement ecosystem approaches to natural resources that will safeguard the ecological integrity of the environment, including our waters, for future generations.

Additional comments include:

**Preserving Ontario's headwaters through education and action
www.ohwi.ca ♦ Andrew@ohwi.ca ♦ 416 857 9484
4 Wisteria Road, Toronto, Ontario, M1R 4X8**

- IWM: We ask the province to expand the discussion, both internally and with other agencies and stakeholders, on the possible application of Integrated Watershed Management in Ontario;
- Section 2.4: We are encouraged by the stakeholder approach to the Water Response Teams (WRTs). We have a concern, however, about the availability and provision of appropriate data to the members of the WRTs, as well as to the public, not only on developing low water issues but in a broader sense in terms of water budgets and watershed report cards.

We urge better public education and more timely access on Government of Ontario databases and reports dealing with water, significantly improved information on water impacts from agricultural drainage tiles; from mines, pits, quarries, and dumpsites; and with respect to aquifer and other withdrawals vis-à-vis recharge rates.

In particular, we urge the Province to develop indicators for which it will require reporting from all municipalities and conservation authorities on headwater preservation, including changes to headwater streams and the conversion of natural heritage areas to other purposes such as forestry activities, agriculture, or development.

- Streamflow and Monitoring: The OHI supports the sections of the document dealing with these issues. We urge the province to address a few competing interests, including:
 - a. Establishing a long-term perspective on how reduced rainfall in a changing climate may impact not just drinking water supplies but water for nature, the ecological integrity of our vast forests and wetlands of Ontario, and the protection of Ontario's agricultural capacity. The OHI is concerned, for example, that the debate about reduced greenhouse gas emissions is too focused on maintaining our economic competitiveness rather than on negative impacts to our freshwater ecosystems, designated as the planet's most threatened ecosystem by the Intergovernmental Panel on Climate Change.

We believe that MOE, MNR, and OMAFRA, supported by sister ministries, should put forth strong scientific principles for maximum global level of GHGs, such as the 350 ppm articulated by Dr. James Hansen of NASA, that will safeguard the future on Ontario's ecosystems, especially our water resources, long before we experience low water supplies for our residents. Indeed, if we wait until then, the trends may be too difficult to reverse; and,

- b. Ensuring the adequacy of the province's water monitoring networks, including for:
 - the majority of our waters that flow north;
 - the verification of any low water modeling that may be developed, &
 - with respect to the public availability of data.

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In conclusion, the OHI applauds the Province on the development of this document and asks the Province to further address the management of our water resources and include elements in the Low Water response Plan to:

- Acknowledge the environment as the foundation of our quality of life;
- Implement ecosystem approaches to natural resources that will safeguard the ecological integrity of the environment, including our waters;
- Expand the dialogue on the possible application of Integrated Watershed Management in Ontario;
- Improve public education and more timely access on Government of Ontario databases and reports dealing with water;
- Develop indicators for which it will require reporting from all municipalities and conservation authorities on headwater preservation;
- Pursue scientific principles to establish a maximum global level of GHGs that will safeguard the future on Ontario's ecosystems; and,
- Ensure the adequacy of the province's water monitoring networks and its use to verify any low water modeling that may be developed.

Sincerely,

Andrew McCammon
Executive Director