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642 Woolwich Street,

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April 7, 2018.

Nisha Shirali  
Senior Policy Analyst,  
Ministry of the Environment and Climate Change,  
Policy and Program Division,  
Environmental Policy Branch,  
40 St. Clair Ave. West,  
Floor 10,  
Toronto, ON  
M4V 1M2

## **Re: EBR 013-1817 Watershed Planning in Ontario: Guidance for Land-Use Planning Authorities**

Dear Nisha Shirali,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario.

The CFFO is very concerned that the current draft of “Watershed Planning in Ontario: Guidance for Land-Use Planning Authorities” has not had sufficient input and review from the appropriate staff within OMAFRA. Key omissions indicate that OMAFRA has not had the opportunity to provide the appropriate input. It is unacceptable for a version of this guidance document to be finalized without this important input on behalf of farmers and the agricultural sector in the province. Our comments on omissions we have noticed are included below.

***We strongly recommend that the current draft be reviewed by the appropriate OMAFRA staff and once their revisions and additions relating to agriculture and rural areas have been incorporated, that a revised draft of the guidance document be reposted for public comment before it is finalized.***

### **Section on Interconnections with Other Policies and Strategies**

This section of the guidance document outlines other provincial policies beyond those that require watershed planning (such as the Provincial Policy Statement or Four Plans) that also connect with watershed planning. Although Agricultural Systems are mentioned, it is the only key policy that is not expanded in a further subsection of all the other policies mentioned (pg. 19). This omission is an example that illustrates why OMAFRA’s input is required to properly flesh out the connections between the Agricultural Systems policy and watershed planning.

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## Drainage Infrastructure

The current draft of the guidance document focuses heavily on natural water features. Another key oversight is that drainage infrastructure in rural areas is not clearly addressed including related drainage maps and municipal drains (under municipal jurisdiction). Updated drainage maps should be included as part of the watershed or subwatershed delineation and characterization. Properly maintaining municipal drains should also be part of the implementation process of establishing and maintaining municipal infrastructure related to water management along with other storm water infrastructure. The Drainage Act can be applied in rural and urban areas to help improve storm water management and is another important consideration that should be included in the guidance document as part of watershed planning.

## Summary

The CFFO is very concerned that agriculture, agricultural related policies and rural infrastructure has not been properly considered in the current draft of “Watershed Planning in Ontario: Guidance for Land-Use Planning Authorities.” We request that this draft be given proper review by the appropriate staff within OMAFRA to ensure these policies and impacts are properly considered. Once revisions and additions have been made, we further request that the revised draft be reposted for public comment before it is finalized.

Thank you for your consideration of our concerns and of our request for further review and revisions.

Sincerely,

Clarence Nywening, President  
Christian Farmers Federation of Ontario

CC: Sharon Bailey, Director, Food and Environmental Policy Branch, OMAFRA