



Long Point Region Conservation Authority

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ERO 019-1340 Updating Ontario's Water Quantity Management Framework

Response to Discussion Paper

Submitted July 30, 2020

Thank you for the opportunity to comment on the Proposal Paper for Updating Ontario's Water Quantity Management Framework (EBR #019-1340).

The Long Point Region Conservation Authority generally supports the proposed amendments to the Water Taking and Transfer Regulation (O.Reg. 387/04) and the Environmental Activity Sector Registry - Water Taking Regulation (O.Reg. 63/16) with the goal to:

1. Establish clear provincial priorities of water use;
2. Update the approach to managing water takings in stressed areas;
3. Make water taking data more accessible; and
4. Give host municipalities more input into water bottling decisions.

LPRCA supports the proposed priorities for water resource management as outlined in the Proposal Paper:

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|-------------------------------|---|
| I. Highest priority uses | 1. Environment and Drinking Water (equally) <ul style="list-style-type: none">• <i>Environment</i> (e.g. maintaining stream flows, water levels and water quality to protect human health and sustain freshwater ecosystems)• <i>Drinking Water</i> (e.g. municipal and indigenous water supplies, private domestic use, livestock watering, schools, hospitals) |
| | 2. Agricultural Irrigation |
| II. Priority Among Other Uses | 1. Industrial / Commercial (e.g. golf course irrigation, aggregate washing, industrial cooling) |
| | 2. Others (e.g. aesthetic, other non-essential uses) |

The proposed priorities recognize the special water needs of living things as well as the municipal need to secure sustainable, affordable water supplies necessary for long-term growth. At the same time, the proposed priorities balance the water needs for agriculture and for other commercial and industrial users vital to community prosperity.

LPRCA strongly believes that the existing high water use area designation and regulatory restrictions reflected in the current O.Reg. 387/04 Sections 3 and 5 must be amended as proposed. LPRCA along with Norfolk County has advocated for a change in approach for many years.

We are happy to see that, with the information now available, the technical experts have deemed water taking in the Norfolk Sand Plain to be sustainable.

LPRCA also believes that the assessment and management of water takings proactively, on an area basis is the best solution in stressed areas. We ask that processes be flexible and encourage local water user communities to work collaboratively to manage water resources and deal with drought.

LPRCA applauds the proposal to make water taking data more accessible. The data is vital to LPRCA's water management programs through which LPRCA:

- chairs and provides information and support to the LPR Low Water Response Team;
- is circulated and provides comments on PTTW applications;
- maintains a water use inventory for the watershed;
- monitors related conditions such as water temperature, and reports on watershed health.

Thank you once again for the opportunity to comment on "Updating Ontario's Water Quantity Management Framework" (EBR #019-1340). LPRCA is prepared to assist with the updates to technical guidelines through our continued participation in the provincial Water Quantity External Working Group.

Sincerely,

A handwritten signature in cursive script, appearing to read "Judy Maxwell".

Judy Maxwell
General Manager
Long Point Region Conservation Authority