

Friday, February 5, 2021

Submitted via the Environmental Registry of Ontario and via email to waterpolicy@ontario.ca and brent.taylor@ontario.ca

Environmental Policy Branch, Water Policy
Ontario Ministry of the Environment, Conservation and Parks,
Foster Building 10th Floor, 40 St Clair Ave W
Toronto, ON M4V 1M2

Dear Mr. Taylor,

RE: ERO #019-2017 Proposed Implementation of Updates to Ontario's Water Quantity Management Framework

The City of Guelph (City) appreciates the opportunity to comment on the proposed implementation of updates to Ontario's Water Quantity Management Framework (the "Guidance Document") under the Ontario Water Resources Act (OWRA).

The City has a keen interest in the efforts of the Ministry of Environment, Conservation and Parks (MECP) to manage water takings to protect the long-term sustainability of Ontario's water resources. Our interests are primarily with respect to the protection of water resources in and around the City of Guelph that are used as sources of our municipal drinking water. For water supply purposes, the City has numerous Permits to Take Water (PTTW) for groundwater wells and wellfields, a groundwater collection system and a surface water taking on the Eramosa River. A Tier 3 Water Budget and Local Area Risk Assessment completed by the City has identified the potential for water supply shortages under future demand and drought scenarios. For this reason, the City has a special interest in any proposed changes to the water taking and permitting process as these are important protections in addressing anticipated threats to our drinking water supply as Guelph continues to grow.

The City's primary comments on the proposed implementation of updates to Ontario's Water Quantity Management Framework are summarized below:

- **Ensure alignment between the Clean Water Act, the Ontario Water Resources Act and the Places to Grow Act:** The City is supportive of the MECP's proposed process for water quantity management. Since the purpose of the Clean Water Act (CWA) is to protect existing and future sources of drinking water, the City suggests that MECP coordinate source protection programs under the CWA with the proposed changes to the water taking process under the OWRA, particularly the application of Tier 3 water budget and local area assessments, where they are available. Alignment between the CWA and OWRA

so that both protect future municipal drinking water is important as is ensuring rules and regulations under these Acts also reflect growth projections as per the Places to Grow Act.

- **Set clear criteria to define stress areas and cumulative impacts:** The City agrees with the area-wide management strategy for a proposed water quantity stress assessment and asks that clear criteria help define the area of stress and cumulative impacts. In particular, clear criteria should be available where groundwater and/or surface water sources are involved. These criteria should be based on physical water budget properties.
- **Leverage existing Tier 3 water budgets when developing local water management strategies:** The use of integrated groundwater-surface water models (i.e., numerical models) have become the dominant method of stress-level assessment in Ontario. The province has several existing tools that provide guidance on source protection and on water budget assessments. The City of Guelph suggests that existing Tier 3 water budget processes already in use in Ontario be leveraged so that similar assessment criteria can be used when determining stress levels as part of management strategies under the OWRA.
- **Engage with municipalities and other interested parties early:** The City is supportive of an engagement strategy with local water users, stakeholders and Indigenous communities. However, engagement of these stakeholders and parties should take place at the 'Preliminary Assessment' stage rather than at the 'Engage' stage to best leverage current investments in water management monitoring data and models. Local municipalities have extensive knowledge to assist MECP in the decision-making process. A collaborative partnership model with municipal stakeholders, local conservation authorities and other key parties can lead to efficiencies in strategy development, while reducing duplication and supplementing the organizational knowledge of all parties.
- **Identify municipal drinking water as the highest priority category:** The City is supportive of setting priorities for water use and is particularly supportive of identifying municipal drinking water as the highest priority category. This prioritization will help groundwater-based communities meet service requirements in line with provincially-mandated growth targets. Further, the City suggests MECP consider providing further explanation as to how water uses of equal priority (such as municipal drinking water and the environment) will be considered and prioritized given their competing interests.
- **Prioritize reserving water for future municipal drinking water needs:** The City is concerned that the Guidance document's 'priorities of use' section does not allow for the reservation of future drinking water to meet anticipated needs. The Guidance document instead emphasizes that permit applications are



reviewed based on existing conditions. This stance by the MECP makes it difficult for ground water-based communities to fulfill our growth obligations under the Places to Grow Act given anticipated drinking water shortages in our community and the inability to 'reserve' water for future use under the proposed framework. Instead, the City suggests that all permit-related decision-making should consider future impacts. Throughout our comments, we have referenced where the City's Tier 3 model, which predicts future stressed conditions under a drought scenario, could enhance the MECP's analysis when developing a Water Quantity Management Strategy. Information from Tier 3 models should be considered in all water quantity-related decision-making.

Thank you for considering our input as part of this consultation. Attached to this letter you will find further, more detailed comments from the City of Guelph on the Guidance Document. I encourage you to reach out if you have any questions.

Sincerely,

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Attachment 1

City of Guelph Detailed Comments - Proposed Implementation of Updates to Ontario's Water Quantity Management Framework– Environmental Registry Notice #019-2017

General Comments with Respect to Water Quantity Management in Ontario

The City supports proposing regulatory changes for managing water takings to protect the long-term sustainability of surface water and groundwater and to ensure these important resources are responsibly managed and safeguarded now and for future generations. General comments on the proposed Water Quantity Management Framework (WQMF) are provided as follows:

Coordination with the Clean Water Act and Local Source Protection Plans:

Leveraging the Ontario Water Resources Act, the proposed WQMF proposes several enhancements to the provincial water taking program including area-based water quantity management and priorities of water use. In doing so, the OWRA works in stride with the Clean Water Act (CWA), which focuses on protecting existing and future sources of drinking water.

Both the CWA and OWRA require protection of water quantity. However, the CWA requires protection of both existing *and future* water quantity for municipal drinking water systems. To improve the proposed WQMF, we recommend that the MECP align the language the WQMF around water quantity for municipal drinking water systems with CWA so that it also requires protection of future municipal drinking water.

Existing Water Quantity Studies under the CWA and Source Protection Programs

A number of regions within Ontario have completed water budget studies under the CWA as part of source protection programs. The tiered projects have considered the availability of water to support municipal drinking water systems through an evaluation of water quantity stress. In some cases, like for the City of Guelph, the projects have advanced to a Tier 3 Water Budget and Local Area Risk Assessment where the municipal drinking water system was considered to have potential for stress, either under existing demand, future demand or drought scenarios. These projects represent a considerable investment by the Province to compile existing water budget information and to understand local water quantity stresses. For this reason, these studies should be used and appropriately maintained to serve as the basis for any future stress assessments and water taking management strategies in corresponding areas. This approach would align with the Made-in-Ontario Environment Plan.

Wellhead Protection Areas for Water Quantity and Water Taking Management Strategies

For Tier 3 water budget studies, under the MECP Technical Rules, a wellhead protection area for water quantity (WHPA-Q) has been delineated. These WHPA-Q's have been delineated using an MECP-supported process that is reinforced through well-defined water budget manuals. The WHPA-Q represents areas in which water taking activities could be considered to be significant threats to drinking water sources. Since stress assessments have already been conducted on these areas and considerable background information has been developed in support of these projects, they should, where a significant risk has been designated for the area, be used as the basis for development of the water taking management strategy.

Detailed Comments on the Draft Guidance to Support Area-based Water Quantity Management

As per the Guidance Document, the proposed updates would amend the regulation to allow the Director to make decisions regarding the stress level of a groundwater or a surface water source and, when required, to develop a strategy for management of water takings within an area. The proposed process would involve a preliminary assessment of the area, a decision on the stress level, the preparation of the strategy, engagement of stakeholders, implementation of the strategy and reviews of the strategy once implemented. The City's comments with respect to this approach are provided below.

The draft Guidance introductory comments reference determining stress and cumulative impacts of multiple water users. The City would be interested in the criteria the MECP will be using to determine stress in a groundwater or and/or surface water source. For example, criteria based on physical water budget properties would provide for a more defensible position as has been done for the Tier 3 water budget projects. Determining stress based on comparisons of the amount of water available in the system (i.e., from recharge or baseflow) to the demand for water is a traditional method. The Technical Rules used in source protection provide guidance and the Ministry of Natural Resources and Forestry have produced a number of guidance manuals on water budget assessments.

With respect to cumulative impacts of multiple water users, the City would also be interested in the criteria to determine cumulative impacts as this is not an easy process and it is uncertain how the MECP will conduct the cumulative impact assessments. Impacts can develop over an extended period of time and can relate to reductions in baseflows and changes to aquatic and terrestrial habitats which are often gradual and difficult to measure. The City would suggest that predictive modelling tools are required for this task. The models can incorporate the multiple water takings and assess the resulting effects. Groundwater-surface water models have been developed under the CWA and source water protection programs but the models are not owned by the Province. To better understand the process and scope or details of a cumulative study, it would be beneficial for the MECP to provide more information on how cumulative impacts will be assessed as part of the area-wide management strategy.

Area-Based Water Taking Management Strategy

The Guidance Document describes developing an area-wide management strategy for a water quantity stressed area. The City agrees with this proposed approach but suggests that the area of “stress” may be difficult to define without clear criteria for determining “stress”, as described in the comment above. The use of the MECP’s Technical Rules for source protection programs describe a process for delineating stress levels and defining protection areas for water takings (i.e., WHPA-Q, Intake Protection Zone-Q) which could prove useful if adopted for defining a stressed area. To ensure consistency in the application of these terms throughout the various ministry programs, we recommend that the same definition be used for defining the area for a water quantity management strategy. The City of Guelph, for example, has a WHPA-Q that defines an area of significant stress in which future water takings may affect the municipal water supply particularly under drought conditions. The WHPA-Q, in this example, would be a suitable area for an area-wide management strategy. The advantage of this area is that it already has the appropriate level of scientific assessment completed and is supported by requirements under the CWA. Locally, the City suggests that the WHPA-Q be adopted as the area for development of an area-wide water quantity management strategy.

Process for Developing a Water Taking Management Strategy (Figure 1)

The City generally supports the process for developing a water taking management strategy, however the City would suggest a more cooperative and consultative process from the beginning to the end, whereby local water users, particularly municipalities, and other stakeholders assist in developing the strategy in a partnership. This would allow for past studies and municipal monitoring programs to inform the water taking management strategy. For example, in Guelph, the City has already completed the preliminary assessments through its source protection program and defined a stress level and a WHPA-Q. The City has decades of comprehensive monitoring data and a well-calibrated, regional numerical model that includes the WHPA-Q that can be used in the development of any water management strategy.

It would be more efficient and appropriate to establish a process to effectively utilize the important work completed to date. There is extensive knowledge within the local municipalities and other stakeholders to assist MECP in the decision-making process.

Preliminary Assessment

The Guidance Document states that “the Ministry initiates assessment using existing available information on water resources and water use in the area”. The trigger for the preliminary assessment is not well defined and the MECP should provide some guidance on parameters that might lead to the assessment. Past interference incidents may be an obvious trigger but triggers for changing conditions may not be so obvious. In addition, the preliminary assessment appears to be reactive to existing problems rather than proactive to provide protection of

existing and future water quantities, particularly those required for municipal drinking water as is required under the CWA. The City would suggest, again, that the MECP look to the source protection programs and the tiered water budget projects, where they are available, as a starting point for the development of water taking management strategies. Tier 3 Water Budget and Local Area Risk Assessments were designed to identify potential water quantity stresses under existing conditions, future demand scenarios and drought scenarios. The MECP should consider reviewing and adopting the information and processes used in these programs for preliminary assessments. If the MECP adopted the same approach as defining a stressed area which results in a WHPA-Q, then the MECP could move to the next steps of developing the management strategies.

The preliminary assessments indicate that the MECP, to determine if a management strategy is warranted, “would gather and analyze existing available data and information to confirm that one is warranted”. This appears to be a different approach than in the past, where the MECP reviews and approves data, rather than gather and analyze data. The studies which the MECP will rely on, we assume, are those produced by conservation authorities, municipalities and other water takers. As suggested above, developing a collaborative approach with others may be a more preferred approach and address these concerns.

The MECP has identified a number of sources of information that the MECP may access for a preliminary assessment. Where Tier 3 water budget studies have been completed, most of the information referenced in the Guidance Document will have already been compiled by the Source Protection Authorities (SPA) and incorporated into Assessment Reports. MECP should consider working with the SPA and municipalities to access this information and to work in partnership with these agencies to support the preliminary assessments. In addition, the MECP should consider “unlocking” the wealth of information contained within the PTTW process, especially information contained in PTTW annual reports submitted to the MECP. These reports contain highly relevant information on site specific conditions that can be applied to the area-wide assessments. Generally, this information from private water takers, which may consist of pumping rates, groundwater level measurements and stream level/flow measurements, has been available to the MECP in hard copy reports, but, not in electronic formats that could be used in area-wide assessments. The City notes that MECP is proposing changes to O.Reg. 387/04 to “publish” or “otherwise make available to the public” data related to permit holders water takings and it would be beneficial if this data is in an electronic format that can be used in assessments and management of water quantity.

The Guidance Document indicates that if the Director determines through a preliminary assessment that development of a water management strategy is needed, “the Director would post an information notice on the Environmental Registry”. As discussed below under engagement, a full engagement at the beginning of this process would be beneficial for all.

While the MECP provides information in the Guidance Document on how the preliminary assessments will be done and the actions the MECP would take if it is determined that a management strategy is required, there is no information

provided on how the MECP might respond if the preliminary assessment leads MECP to determine that the area is not stressed. The City would suggest that this aspect of the Guidance Document should be described in more detail. The MECP should provide clear, objective sets of evaluation parameters and triggers in the preliminary assessment process including a science-based review and analysis procedure. This would allow stakeholders an opportunity to engage with the MECP in a meaningful way, if the stakeholder analysis differed from the MECP's.

The Guidance Document indicates that "The assessment may reveal information and knowledge gaps related to water resources and/or water use in the water stressed area." This is an important point and the City has concerns that gaps may need to be addressed as part of the assessment before a decision can be made on the level of stress in an area. Of particular concern is the lack of surface water monitoring data on stream flows, especially for low order streams that may be most susceptible to water quantity impacts. A lack of understanding on stream flows and environmental flow requirements may be a significant gap in knowledge and may hamper the adequacy of the assessments and the resulting decisions by the Director. The MECP may want to carefully consider the data needs for a preliminary assessment and ensure that relevant information is available to perform the assessment before decisions are made on the stress level of an area. In some cases, MECP may need to embark on a data collection phase to fill data gaps to ensure that decisions on stress levels are defensible and not based on an inadequate understanding or lack of information.

Preparing a Water Taking Management Strategy

Where the Director has made a decision that an area is under stress, the ministry will prepare a water taking management strategy with the strategy including: goals and objectives; management measures; monitoring and assessment actions; and review, evaluation and continuous improvement. The City is generally supportive of this approach and seeks clarification on how the strategy will be developed. As noted above, the City would support a collaborative process from the beginning so that local interests can be included and water quantity for municipal drinking water sources can be protected.

It would be beneficial if the MECP outlined how a draft strategy will be prepared and presented to the stakeholders and public, how comments on the strategy will be addressed and how the strategy will be implemented including roles and responsibilities. These details are required to evaluate the effectiveness of the process and the ability to implement the strategy.

Additional comments on the components of the strategy are provided below:

Goals and Objectives

The City is generally supportive of the process to develop the goals and objectives of the strategy provided it is done in a collaborative manner with input from major water takers. The City would note that municipalities represents 61% of the water use in the Grand River watershed ([Grand River's Water Use Inventory Report 2011](#)) and it would stand to reason that any water taking management strategy in a watershed such as the Grand River should involve municipalities. The City would

also suggest that the responsibilities of the MECP under the CWA to protect existing and future water quantities for municipal drinking water systems be included in the goals and objectives of a strategy, where applicable. Clarification is also required as the strategy also appears to have been reduced down from area-based water quantity management to a water taking management strategy which would imply that the strategy would only manage water takings and not the water resources that provide the water. The MECP may want to consider establishing goals and objectives for a more holistic approach consistent with subwatershed management plans and the Provincial Policy Statement rather than just managing the water takings within the area of interest.

Management Measures

The City is generally supportive of the approach proposed for management measures within the assessment areas, again, provided they are done on a collaborative basis with the water takers. Measures are proposed for improving the understanding, water security and sustainability of the water resources and these are generally supportive actions. However, the proposal states the measures would “focus on water users most impacting sustainability”. In the City’s WHPA-Q, this would be the City since Guelph is the largest water taker in the area. The City has always accepted its duty for responsible and sustainable water supply management and would willingly accept MECP’s support in additional water management measures. However, the measures should not be punitive or burdensome for the municipality and must enable the City to meet its provincially-mandated requirements for growth (e.g., Places to Grow Act). Since the implementation and oversight of the CWA is also the responsibility of the MECP, any measures in a water taking management strategy must ensure the protection of existing and future water quantity for municipal drinking water systems. The City would also add that responsibility for water management benefits all water takers and the community at large and all water takers within an area should contribute to the management of the resource to some extent. Even small water takers could contribute to management by being a source of information and monitoring data to help improve understanding of the water resources and to fill knowledge gaps.

The Guidance Document states “the ministry would examine measures to enhance water efficiency and water system optimization”. The City is an excellent example of a comprehensive and industry-leading water conservation and efficiency programs and routinely optimizes its water supply systems through updates to the City’s Water Supply Master Plan.

The Guidance Document also states that “measures, including restrictions on water takings for the purposes of resolving competing demands for water among water users would consider the proposed priorities of water use....” On this point, the City would point out that drinking water for municipalities is a high priority use and, in addition, the CWA requires protection of existing and future water quantity used for municipal drinking water systems.

Monitoring and Assessment Actions.

The Guidance Document states “the strategy would also identify actions to collect and consolidate information that can be used by the ministry to improve

understanding of the causes and sources of water quantity stress in the area and to guide scientifically-based water management decisions”. It would be helpful to know who would be responsible for implementing the actions identified. Although the Guidance Document implies it is the MECP’s responsibility to do this work, the MECP has not traditionally conducted monitoring and assessment actions to any great extent, and there is a concern that the MECP will delegate these responsibilities to others to perform.

The Guidance Document also states that the monitoring and assessment actions will be used to refine aspects of the ministry’s preliminary assessment such as cumulative impacts, environmental flow needs and susceptibility to drought. More information on how the MECP will complete this work would be helpful, including roles and responsibilities and who would fund this work.

Review, Evaluation and Continuous Improvement

The City is generally supportive of the process outlined to review, evaluate and continuously improve the water taking management strategy. As it is noted above, the MECP should explain the details of this and how it will be done. The identified process will require MECP to maintain the strategy and to ensure that the management measures, monitoring and assessments and reviews and evaluations are implemented. The City suggests that MECP outline specifically how the management strategy will be implemented. Similarly, the MECP should outline the details of how the stakeholders and public will be kept informed through the life of the management strategy.

Engaging Water Users, Local Stakeholders, and Indigenous Communities

The City has identified in its comments above concerns regarding engagement with local water takers, other stakeholders and the public. In Figure 1: Process for Developing a Water Taking Management Strategy, the “Engage” task is listed as the fourth task in the strategy. The City would suggest that engagement needs to occur in the initial stages in the development of the strategy and should continue throughout the process. The Guidance Document mentions the possibility of using a collaborative approach. Instead, the City suggests that this needs to be the dominant engagement approach for the strategy to be successful. As noted, the Guidance Document identifies the lead role of the MECP in water quantity management, however, other agencies, such as municipalities and conservation authorities have had lead roles in water resource and water supply management in the past, particularly in source protection and watershed management programs. These agencies also maintain groundwater and surface water databases and groundwater and surface water models that can be used to support the water taking. The City would strongly advocate for partnerships in developing and implementing the water taking management strategy. A participatory and collaborative process with municipalities and conservation authorities is likely to make best use of available resources, provide access to relevant databases and water resources information and result in a more effective and implementable strategy.

The City also has concerns about how the MECP would implement engagement throughout the strategy development and implementation process. In the past, the MECP posts information on the Environmental Registry of Ontario, provides a period of time to post comments and then issues a decision. This process does not adequately engage stakeholders and the public for the proposed process particularly since the MECP has proposed a multi-step process (i.e., Figure 1 where each steps build on the previous step) each of which could benefit from community and stakeholder engagement in some form. The MECP may want to consider adding in an initial step to develop a stakeholder/community engagement and consultation plan to help guide the engagement process throughout the development and implementation of the strategy. The engagement process could include similar steps as to what the MECP requires municipalities to do for Class Environmental Assessments. As is described in the Guidance Document, the size and scope of engagement could be tailored on a case-by-case basis but it is important for the MECP to commit to true multi-stakeholder engagement and consultation in the process.

Aligning a Water Taking Management Strategy with Other Provincial Policies and Programs

As noted throughout the City's comments, the City strongly advocates for the alignment of the WQMF and water taking management strategies with CWA source protection programs, and growth targets under the Places to Grow Act. It is the City's position that the CWA and the OWRA have general purposes to protect water quantity for municipal drinking water systems and that the source protection programs for water quantity strongly align with the proposed processes to identify stressed areas and provide background information in support of water taking management strategies. The MECP should ensure that the management measures and monitoring and assessment actions in the strategies act jointly in the protection of existing and future drinking water quantities for municipal water supply systems and all other water takers in the area.

Draft Guidance to Support Priorities of Water Use

The Guidance Document outlines the process the MECP will apply in establishing provincial priorities of water use to guide decisions where there are competing demands for water. The City is generally supportive of setting priorities for water use and is particularly supportive of municipal drinking water as the highest priority category.

Comments on the priority of water use from the Guidance Document are provided below.

What are the Priorities of Use?

The City of Guelph supports setting priorities for water use with municipal drinking water as a highest priority use. It is the City's hope that the apparent disconnect between the OWRA which has drinking water and the environment as priorities and the Clean Water Act which protects existing and future drinking water sources will be resolved.

Similarly, the MECP should consider providing further explanation as to how environment and drinking water will be considered equally since they have competing interests. A groundwater taking for municipal drinking water, for example, may decrease environmental flow needs by decreasing stream flows. If they are treated equally, the priority of one would be at the detriment of the other. In considering setting priorities, MECP may want to establish factors to be considered in the setting of priorities. For example, a priority for municipal drinking water could consider social and economic benefits of additional water supply to meet provincial growth targets in exchange for some degradation of the environment. In areas where there are existing water shortages, the setting of priorities may need to consider the sustainability of the water resources and future water needs of municipalities against lower priority uses as well as water budget considerations. Managing priorities may need to eliminate a lower priority use in order to add a higher priority use to maintain the water budget and not result in impacts to the environment.

The City firmly believes that prioritization decisions must be informed by a comprehensive understanding of the subwatershed in question, which would be gained through environmental monitoring, and establishing and maintaining a predictive water budget model. Furthermore, using a long-term growth perspective, the water budget model should also be used to determine areas which will experience significant water quantity stress in the future. These areas are then afforded additional protections (e.g., wellhead protection areas for water quantity) that would be needed to sustainably manage additional water takings now and into the future. As currently outlined in the Guidance Document, the City is uncertain how prioritization will be incorporated into the MECP review process for PTTW. MECP may want to entrench the concepts on priority of use into the MECP PTTW manual and ensure alignment across provincial guidance documents.

In setting out priorities, MECP is considering replacing the “Water management: policies, guidelines, provincial water quality objectives” and therefore MECP will need to redefine concepts such as “fair sharing” and “well interference”. Setting priorities would presumably negate the concept of fair sharing in providing priorities for municipal drinking water over industrial water takings. Well interference is generally based on the concept of “first in time, first in right” where new water takings cannot interfere with existing water takings. Setting a priority of one use over another regardless of when the water taking was established would change a long-standing position on water rights in Ontario.

When do the Priorities of Water Use Apply?

The Guidance Document states “Priority of water use can be used at the discretion of the permit Director to help resolve competing demands for water among established water takers to a shortage of water within an area.” The City expected the water taking management strategy would be used as the tool to establish priorities of water use in areas under stress. As referenced above, criteria to define stress would be helpful. Criteria based on physical indicators such as declining water levels, reductions in baseflow or recharge versus demand considerations could be built into the development of the water taking management strategy and circulated for consideration as part of the engagement program. In this manner,

potentially affected water takers would have the opportunity to comment on the process thereby promoting more acceptance of the priority setting.

How Do the Priorities of Water Use Apply?

In the Guidance Document, the MECP has provided examples of how the permit Director may amend permits to address the priority of water use. The City is generally supportive of the proposed amendments however, it is expected that the most appropriate amendments would be developed on a case-by-case basis. The MECP has also indicated that the appropriate measures would be determined based on technical information. It is suggested that the technical information should be derived from the water taking management strategy and criteria for the setting of priorities in water use be developed as part of the development of the strategy.

Other Considerations for Applying Priorities of Water Use

Priorities of Water Use as a Last Resort

The concept of setting water use priorities as “a last resort” should be reconsidered. Planning, developing and managing water resources should be implemented well in advance of a last resort measure such that setting priorities provides for the optimum use of water for the greatest benefit of society. Monitoring of the water resources needs to begin now so there is sufficient understanding to manage the resource in the future and to provide for priority allocation of water.

Area-Based Water Taking Management Strategies

As noted above, the priority of water use should be developed as part of the water taking management strategy and should be incorporated as part of the management measures in the strategy.

Protecting Future Drinking Water Supplies

The Guidance Document states that “priorities of water use cannot be used as a mechanism to ‘reserve’ water for long-term, future water needs of higher priority use within an area, including municipal drinking water supplies”. In light of this statement, the City has concerns as to how future water quantity needs of municipalities will be considered in the setting of priorities of water use. The CWA is intended to protect existing and future sources of drinking water therefore this should be considered as the highest priority use of water. The Province has imposed growth targets on municipalities through the Places to Grow Act and therefore there is the expectation that municipalities will need more water supply in the future to support growth. In setting priorities of water use, MECP should be aware of future water supply needs of municipalities in areas that may be under stress and ensure that PTTW’s do not exceed the available water that may be needed for this growth. Municipalities typically develop Water Supply Master Plans that provide for future water demands and alternatives for sources of water to meet the future demand. When setting priorities, MECP should rely on the Master Plans and manage the water takings in the area to ensure that the water is available in the future for municipal growth.