



March 11, 2022

Jessica Isaac
Environmental Policy Branch
Ministry of Environment, Conservation, and Parks
40 St Clair Avenue West
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Re: Conservation Ontario's Comments on "Subwatershed Planning Guide" (ERO# 019-4978)

Dear Ms. Isaac,

Thank you for the opportunity to provide comments on the "Subwatershed Planning Guide" (hereafter referred to as the Guide). Conservation Ontario (CO) is the network of Ontario's 36 conservation authorities (CAs). These comments are not intended to limit in any way comments submitted by a CA on this proposal.

Conservation Ontario strongly supports the role of subwatershed planning in supporting both sustainable and resilient communities and watershed resources. The following general comments on the Guide with some key edits are offered in this regard for the Ministry's consideration. As well, additional detailed comments have been provided in the attachment to this letter.

The Guide should acknowledge that there are many reasons to prepare subwatershed plans in addition to informing land use planning. It is suggested that the purpose is to *guide municipalities in undertaking subwatershed studies for land use and infrastructure planning under the "Planning Act" and assist CAs and other agencies in fulfilling their roles and responsibilities under other provincial legislation*. Both municipalities and CAs have requirements which are informed by subwatershed planning and coordination at the outset is necessary to avoid duplication, unnecessary costs, and delays.

The terms "watershed plan" and "subwatershed plan" are used interchangeably in the Guide which causes confusion. One reason may be that the Provincial Policy Statement (PPS) references "watershed planning" while the *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* and *Greenbelt Plan* reference "subwatershed planning." Practically, most studies driven by land use planning are done at the subwatershed scale. Thus, we suggest that the Guide focus on best practices for subwatershed-level planning. A companion document dealing with watershed planning may be something that the Ministry may want to consider in the future as was done in 1993. For this reason, it is suggested that references to watershed planning be retained at a high level to set context at the beginning of the Guide and the description of what a watershed plan includes be removed. A statement should be inserted that states "*practically, most studies that are driven by large-scale or site-specific issues are undertaken at a*

subwatershed scale. For this reason, this Guide is focused on subwatershed planning and supports the intent of the PPS and other provincial plans”.

The ‘Benefits of Watershed and Subwatershed Planning’ outlined in Section 1.2 should explicitly recognize the role they can play in: *“Mitigating or adapting to the effects of climate change”.*

Natural Heritage Systems and natural heritage features, including wetlands, play a critical role in the water resource system and in subwatershed planning; inclusive of their contribution to stormwater management and as realized through low impact development/green infrastructure projects. The direct connection between the natural heritage system and water resources as per the PPS should be acknowledged by adding to the first bullet in Section 1.2 *“Protecting, improving, or restoring the quality and quantity of water and natural features that support ecological and hydrological functions in a watershed, including wetlands”.* Watershed and subwatershed planning also informs the delineation and management of the natural heritage system for land use planning such that: *“Identifying and/or refining the natural heritage system of the watershed”* should be included as an additional benefit.

Timelines for collecting data are inconsistently stated in the document. A minimum timeframe for collecting baseline data should be dependent on the unique features, landforms, and hydrology of the subwatershed. For example, a subwatershed with abundant sensitive natural features may require more intensive data collection over a longer time frame than others. The data collection and monitoring time frame should be: 1) assessed and established at the outset, 2) scientifically defensible, and 3) capture all 4 seasons over time, typically over a period of 3-5 years. For this reason and to ensure timeliness, priority setting, baseline data and monitoring, and *“setting the stage”* should be triggered as early as possible in the planning process [e.g., growth management planning or completion of a Municipal Comprehensive Review (MCR)].

While it is important to start subwatershed work early in the planning process, staff capacity and expertise levels vary considerably across municipalities and conservation authorities. Provincial funding or other funding mechanisms and staff resources may be required to ensure this work is undertaken and done in an efficient and timely manner, by qualified professionals.

In addition, the Guide should promote more streamlining among agencies and development proponents. Examples include concurrent document updates for secondary plans and zoning and joint public engagement processes for hazard mapping updates and approvals. The Guide should clearly recognize that subwatershed planning is essential for informing land use planning decisions and resource management strategies and that they must be iterative and integrated.

The description in Section 1.7 (and the footnote in Section 1.6) on the roles and responsibilities of CAs and their possible involvement in subwatershed studies is misleading and incomplete. The Guide states that for CAs to be involved in subwatershed planning, an MOU or agreement with the municipality is required and that *“municipalities may decide to enter into agreements with conservation authorities, as appropriate, to undertake a role in the watershed or subwatershed planning.”*

Conservation Ontario strongly supports strengthening the recognition of the roles and expertise that CAs bring to subwatershed planning to ensure it’s a coordinated and therefore streamlined and cost-effective effort. It should be acknowledged:

- that the identification and management of natural hazards, source water protection, conservation lands, provincial groundwater and surface water monitoring, and watershed-based resource management strategies are mandatory programs for CAs as are the planning functions to ensure consistency with the natural hazards policies (except wildland fires) of the PPS as per O. Reg. 686/21. For these reasons, the Guide should strongly promote partnerships between municipalities and CAs for subwatershed planning.
- that some municipalities may request CAs to provide broader technical input (e.g., baseline data collection and monitoring, ecological expertise) and/or assume a lead role for subwatershed planning, where appropriate (i.e., where subwatersheds cross municipal boundaries). Roles and responsibilities should be clarified through the Category 2 and 3 MOUs or service agreements.

The sections on Policy Context (1.6) and Roles and Responsibilities (1.7 as amended) interrupt the flow of the document and could be included as Appendices to keep the Guide focused on best practices. In addition, references in Section 2.1 to the *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* and *Greenbelt Plan* could be incorporated into an Appendix. This could be supported by a statement in the main text that indicates “*subwatershed plans should also meet all subwatershed planning requirements specified by the Growth Plan and Greenbelt Plan, where either or both apply*”.

Conservation Ontario supports the need for early and ongoing Indigenous engagement and that it should be emphasized in the Guide as well as the cross reference to section 1.2.2 of the PPS which states that “planning authorities shall engage with Indigenous communities and coordinate on land use planning matters”. It is further suggested that the approach (“how to”) outlined in Section 5 be put into an Appendix or, ideally, be outlined in a separate provincial guideline that provides best practices for Indigenous engagement which would apply to all Ministries and public agencies. In addition to leveraging expertise from the Ministry of Indigenous Affairs and input from Indigenous communities to create such a provincial guideline, it should also build on available resources and tools to assist municipalities in engaging Indigenous interests (e.g., municipal-Indigenous relations resources prepared by the Association of Municipalities of Ontario) and other engagement and relationship building strategies and policies prepared by conservation authorities.

The focus of the Guide is primarily on greenfield development within the Greater Golden Horseshoe. It does not specifically address subwatershed planning in the context of resource management and use (e.g., aggregate extraction) or redevelopment/intensification within urban areas. These types of land use changes may require focus on a different mix of studies and considerations, roles and responsibilities, and outcomes. This should be acknowledged within the Guide. Given that the *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* and associated implementing planning instruments pre-suppose accommodating significant growth through infilling, redevelopment, and intensification, a supplemental Guide should be considered.

Additionally, there have been numerous technical gaps identified in the Guide through conservation authorities’ review. These can be addressed through updates to related technical guidelines (e.g., natural hazards) or the creation of new guidelines (e.g., water resources) or the inclusion of a reference in this Guide to recently updated guidance (e.g., Natural Heritage Reference Manual, draft Low Impact Development (LID) Storm Water Management Guidelines). Overall, updates and new guidelines will have the effect of providing clear guidance for a quicker process. Specifically:

- There is a critical need to modernize the 2002 natural hazards provincial technical guidelines (flooding and erosion) to incorporate climate change and cumulative impact considerations and to update technical criteria, best practices, and policy guidance within them. The technical

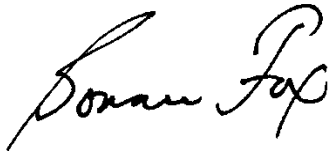
guidelines are currently silent on the risks associated with flood spill hazard and flood mitigation opportunities which is particularly important when considering redevelopment and intensification opportunities as directed by the *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*.

- There is also a need for a provincial Water Resource Technical guide, which could be developed with input from municipalities, CAs, and practitioners.
- Natural Heritage Systems and natural heritage features play a critical role in subwatershed planning and should be expanded upon in the appendix. Existing tools necessary for inventory and assessment of natural heritage systems should be listed (e.g., Natural Heritage Reference Manual, Ontario Wetland Evaluation System, Ecological Land Classification System, etc.).

Finally, it is noted that the water budgets that were completed at the onset of the source water protection program (in most cases over a decade ago) may not reflect new data/available information or newer modelling approaches (including climate change considerations) and evolving land uses to accurately inform subwatershed plans. Appropriate updates should be considered. Provincial investment to modernize and create technical guides and update outmoded water budgets is critical to ensure that sound science and suitable, adaptable, and cost-effective approaches underpin subwatershed planning across Ontario.

Conservation Ontario would be pleased to assist in making timely amendments to the Guide, so it can be released at the earliest opportunity. Should you have any questions about this letter, please contact me at extension 223.

Sincerely,



Bonnie Fox
Policy and Planning Director

1 Attachment: Detailed Conservation Ontario Comments on the Subwatershed Planning Guide

c.c. All CA CAOs/GMs

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ATTACHMENT 1:

Detailed Conservation Ontario Comments on the Subwatershed Planning Guide (March 11)	
Proposal Details	Conservation Ontario's Comments
1. Background and Context	
Purpose of Guide	<ul style="list-style-type: none"> • The following edits to the paragraph under section 1.1 "Purpose of Guide" are recommended: <ul style="list-style-type: none"> ○ "The Guide provides best practices, practical approaches and an administrative, planning and technical framework for guiding and streamlining the advice for implementing land use planning policies related to watershed and subwatershed planning process in coordination with planning for water, wastewater and storm water servicing, water resources, drinking water source protection and climate change resilience in Ontario. This document is intended to be used by municipalities and conservation authorities to inform land use and infrastructure planning under the <i>Planning Act</i>, and programs and services under the <i>Conservation Authorities Act</i>, as well as provincial agencies, landowners and developers, and other stakeholders and groups. The best practices and practical approaches contained in this document are intended to guide subwatershed planning in Ontario, primarily for land use and infrastructure planning under the <i>Planning Act</i>."
Benefits of Watershed and Subwatershed Planning	<ul style="list-style-type: none"> • It's recommended that the introductory text in this section be edited as follows: "Among other things, this guide promotes consistent application of provincial policies and programs and offers a valuable administrative, planning and technical framework for:". • The first bullet be expanded to include "...the quality and quantity of water and natural features that support ecological and hydrological functions in a watershed, including wetlands" • The fifth bullet be expanded to read "Identifying surface and groundwater water resource systems..." • Two new bullets be included in the list of elements promoted in the guide. 1 "Identifying and/or refining the natural heritage system of the watershed" and 2. "Mitigating or adapting to the effects of climate change". • The seventh bullet be amended to read "Streamlining planning processes and reducing unnecessary costs, duplication and delays".
Context	<ul style="list-style-type: none"> • No comments.
Watershed vs. Subwatershed Plans	<ul style="list-style-type: none"> • Figure 1 in the draft is used as an illustrative graphic taken from another website. This graphic should be re-drafted / updated to one of better quality and improved clarity. • The focus of the Guide is "subwatershed planning", therefore, details of what should be a part of a "watershed plan" are not necessary and should be deleted. It is recommended that the text outlining the two purposes for carrying out watershed planning remain, but the subsequent text on watershed planning be deleted. The Province may consider a companion piece on watershed planning at a later date. • The first paragraph on subwatershed planning identifies issues which would trigger the need for a subwatershed plan. It is recommended that "(... or intensification and redevelopment) ..." be included in the list of issues. • The final paragraph in this section speaks to the intention of watershed and subwatershed planning. It is strongly recommended that this paragraph be amended

	<p>to reflect the Guide’s use in supporting CA programs and services by including “...intended to support land use and infrastructure planning and conservation authority programs and services related to natural hazards and other activities...”.</p> <ul style="list-style-type: none"> • It is recommended that a new paragraph be added to the end of this section which reads “Practically, most studies that are driven by local large-scale or site-specific issues are undertaken at a subwatershed scale. For this reason, this Guide is focused on subwatershed planning and supports the intent of the PPS and other provincial plans”.
<p>Relationship of Watershed Planning to Land Use and Infrastructure Planning</p>	<ul style="list-style-type: none"> • In first sentence which speaks to the municipal planning processes informed by watershed planning, it is recommended that “natural heritage systems” be included prior to the final example (identification of water resources) ...”. • For clarity, recommend the removal of the first portion of paragraph two so that it begins with “They also inform regulatory, policy...”. • Figure 2 is difficult to interpret and it is strongly suggested that a simpler chart be developed to better demonstrate how watershed/environmental planning informs both municipal land use and infrastructure planning and CA programs and services, and vice versa.
<p>Policy Context</p> <ul style="list-style-type: none"> • Equivalent Studies 	<ul style="list-style-type: none"> • As an overarching comment, Conservation Ontario suggests that this section could be summarized, and more detail included in an Appendix. • Further to our cover letter, the Footnote should be deleted. • The following sentence is recommended to be added to the end of the first paragraph: “The PPS also provides direction on the protection of natural heritage systems which can be informed by watershed and subwatershed planning”. • Further, Conservation Ontario notes that details regarding planning authorities' responsibility to conform to land use planning policies in the Source Protection Plan, is notably missing from the policy context section. It is recommended these details be included. • The final paragraph in this section lists the information to be included in existing studies to be considered equivalent for the purposes of subwatershed planning. It’s recommended that the following additions be made in the bulleted list. The first bullet should be amended: “The water resource system has been identified using a systems approach that considered natural heritage and policies...”. The fourth bullet should be amended: “Goals, objectives, and targets to protect, improve or restore water quality and quantity, including natural heritage features and systems contributing to water quality and quantity, have been set with...”.
<p>Roles and Responsibilities</p>	<ul style="list-style-type: none"> • For consistency with the intent of the Guide, it is recommended that references be made to “subwatersheds” and “subwatershed planning”, rather than “watershed/subwatershed” in most situations. • It’s recommended the following edits be made to the second paragraph under the “Municipalities / Planning Authorities” subheading: <ul style="list-style-type: none"> ○ Upper and single-tier municipalities will need to should coordinate with lower tier municipalities, conservation authorities, and other agencies involved in resource management to undertake subwatershed planning across jurisdictional boundaries. Where appropriate, municipalities may enter into agreements with conservation authorities for undertaking subwatershed planning and with lower tier municipalities, and with other agencies involved in resource management. These municipalities may decide to enter into agreements with conservation authorities, as appropriate, to undertake a role

	<p>in the watershed or subwatershed planning. Ultimately, Municipalities and other planning authorities are responsible for ensuring studies are completed and for using watershed /implementing subwatershed plans to inform the municipal land use planning and applicable infrastructure decisions.</p> <ul style="list-style-type: none"> • It's recommended the following edits be made under the "Conservation Authorities" subheading: <ul style="list-style-type: none"> ○ Paragraph 1 – Remove the following sentence, "This Act provides that municipalities within a common watershed...to deliver programs and services in natural resource management". ○ Paragraph 2 – "Pursuant to O. Reg. 686/21, conservation authorities are now required to develop a watershed-based resource management strategy with guiding principles and objectives that inform the design and delivery of the mandatory programs and services related to the delineation and management of natural hazards, source protection, conservation lands, and provincial groundwater and surface monitoring. In addition, conservation authorities may deliver planning services and other watershed programs as specified in a memorandum of understanding or agreement between the conservation authority and one or more municipalities.". ○ Paragraph 2 – Remove the following text, "The strategy is to include a summary of existing..., including providing cost estimates for the implementation of those actions". ○ Recommend deletion of paragraph 3 beginning in "Conservation authority involvement in watershed/subwatershed planning..." and ending in "...programs and services related to the risk of natural hazards". ○ Paragraph 4 – In the final sentence, recommend the deletion of "municipally led watershed/" such that the text reads "... inform a subwatershed planning exercise". ○ the deletion of paragraph 5 beginning in "Where, under the <i>Planning Act</i>, the authority..." and ending in "...source protection planning as a mandatory program and service.". ○ Paragraph 6 – "Watershed and Subwatershed planning for municipal land use planning purposes should integrate or leverage these other conservation authority watershed-based initiatives.". • Under the "Province" subheading, references to "watershed planning" should be amended to read "subwatershed planning".
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2. Purpose and Principles of Subwatershed Planning

<p>Purpose of Subwatershed Plans</p>	<ul style="list-style-type: none"> • To improve flow of the document, Conservation Ontario suggests the removal of the two bulleted lists which separately acknowledge the need for subwatershed planning as required by the Growth Plan and the Greenbelt Plan. This information could be summarized into a brief footnote or separately included in an Appendix. • For the bulleted list under "Specifically, subwatershed plans should:", the following bolded text should be added to bullets seven and eight: <ul style="list-style-type: none"> ○ "Recommended practices should address a range of activities (e.g., woodlot management, development servicing, natural hazard and natural heritage management, etc.". ○ "...on the natural environment and determine potential avoidance or mitigation measures...".
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	<ul style="list-style-type: none"> Following the bulleted list, the following text should be included in this section: “Subwatershed plans should also meet all subwatershed planning requirements specified by the Growth Plan and Greenbelt Plan, where either or both apply”.
Principles for Subwatershed Planning	<ul style="list-style-type: none"> It’s recommended the following bolded text be added to select principles for subwatershed planning: <ul style="list-style-type: none"> Principle 1 – “... and is informed by watershed plans and watershed strategies, where they exist”. Principle 2 – “...while informing development and infrastructure planning and conservation authority watershed-based strategies, where appropriate”. Principle 7 – “...supported by multi-year data collection to ensure that current pre-development baseline conditions...”. Principle 9 – “The roles and responsibilities of partners, objectives, milestones and timelines...”. Further, it’s recommended a new principle be added to this list which reads, “Planning authorities are encouraged to incorporate robust public engagement processes, including Indigenous communities, to raise public awareness and support for implementation”.
3. Subwatershed Planning Process	
Setting the Stage (Step 1)	<ul style="list-style-type: none"> It’s recommended the following edits be made to the bulleted list in this section. Bolded text is suggested additions, strikethrough text is suggested deletions: <ul style="list-style-type: none"> Bullet 1 – “Identifying partners with a legislative responsibility related to or an interest in participating in the subwatershed process, such as conservation authorities, Indigenous communities, relevant agencies and stakeholders”. Bullet 2 – “Identifying Indigenous First Nations and Metis communities that are affected... The provincial Policy Statement, 2020 requires that planning authorities engage with Indigenous communities and coordinate on land use planning matters (see section 5.0 for more information on partnering and engaging with Indigenous communities””. Bullet 3 – “Securing agreement consensus from partners on the purpose...”. Bullet 8 – “Determining funding mechanisms and responsibilities early in the process prior to the development milestones and timelines/ This may involve...”. Further, the following edits to Footnote 2 are recommended– “...Until recently, it was not possible feasible to readily map spill areas. Through the use of new accessible tools and technologies...”.
Recognizing and Aligning the Interests (Step 2)	<ul style="list-style-type: none"> The following edits are recommended to the final sentence of paragraph 1: “In establishing a charter, consideration for advancing technical work should be advanced in parallel with land use...”. In the bulleted list under paragraph 2, the following edit to the first bullet: “...data-sharing, monitoring and data collection requirements, and reporting and submission formats, and monitoring and evaluation approaches”. The following edits to the bulleted list following “Members of the steering committee should include as appropriate”: <ul style="list-style-type: none"> Municipality(ies) Planning authorities Conservation authorities Indigenous communities and organizations Watershed or subwatershed councils and/or source protection committee Government Ministries and/or Agencies

	<ul style="list-style-type: none"> ○ Environmental organizations Additional representation on the steering committee, where appropriate, could include: <ul style="list-style-type: none"> – Watershed or subwatershed councils and/or source protection committee – Environmental organizations – Agricultural organizations – Landowners/developers – Other interest groups ● The following edits to the paragraph following the above bulleted list, “As you progress through the subwatershed planning process, you may want There may also be a need to establish topical/subject matter...”.
<p>Preparing and Approving the Subwatershed Plan (Step 3)</p> <ul style="list-style-type: none"> ● Phase 1: Identification of Existing Conditions and Initial Assessment ● Phase 2: Completion of Impact Assessment and Development of the Land Use Scenario ● Phase 3: Implementation and Management Strategies ● Subwatershed Plan Timelines 	<ul style="list-style-type: none"> ● It’s recommended that this section be renamed to “Preparing and Approving the Subwatershed Plan (Step 3). ● The following edits to the final paragraph before subsection 3.3.1, “The following section outlines the key phases of a subwatershed planning process...existing settlement areas). For periodic update of plans or for plans that are carried out to guide land use changes such as intensification and/or redevelopment in urban areas or resource development (e.g., aggregate extraction), the technical studies required to address specific issues should be defined through the Terms of Reference.” ● To maintain the watershed-based approach, the following edit to the first paragraph is requested “...may be broken into smaller coherent areas catchments for the purpose...” ● The following edits under subsection 3.3.1 “Phase 1 – Identification of Existing Conditions and Initial Assessment”: <ul style="list-style-type: none"> ○ Data Requirements and Collection: “Generally, a minimum of one year of monitoring data should be collected to satisfy the requirements for identifying existing conditions over four seasons. However, in the case of unusual conditions such as low precipitation years, two to three to five years of monitoring may will will be required to give a more gather a complete set of data for assessing existing baseline conditions over four seasons. For this reason, it is recommended that baseline monitoring be initiated once an area has been identified for potential growth or significant land use change”. ○ For the bulleted list in this subsection, the following edits are requested: <ul style="list-style-type: none"> – “Geomorphology, including sediment transport” – “Natural hazards including flooding, Erosion erosion and other hazardous sites” – NEW BULLETS “Source water protection vulnerable areas” ○ For the paragraph following the bulleted list, the following edits, “...sensitive features and areas, including appropriate (i.e., science-based and/or as prescribed in regulation or defined in provincial policy) buffers, should be identified...”. ○ Initial Assessment: the following edits to the second paragraph under this subheading: “The initial impact assessment includes an initial technical assessment of climate change vulnerability and resiliency and the impacts to water resource...”. <ul style="list-style-type: none"> – Additionally, the following minor edit to the fourth paragraph under this subheading: “An appropriate model can be selected in keeping with the provincial technical requirements and standards...”.

	<ul style="list-style-type: none"> • The following edits are recommended under subsection 3.3.2 “Phase 2 – Completion of Impact Assessment and Development of the Land Use Scenario”: <ul style="list-style-type: none"> ○ Paragraph 1 – “The technical assessment of how the subwatershed environment will be affected by the development, land uses changes, or future watershed conditions proposed within...”. ○ Paragraph 1 – The following new sentence be added to the end of the paragraph: “Phase 2 work that directly links to the Phase 1 analysis (e.g., modeling of existing conditions) should be advanced after the Phase 1 studies have been completed and agreed upon by all parties to avoid future conflicts and delays”. ○ The addition of a new bullet which reads “Identification of source protection measures” following the “Identification of services proposed in open space areas” in the bulleted list. ○ In the bulleted list following “The various inputs used to identify targets should include:”, the following edits to the first bullet: “Considerations for directing development in away from hazardous lands”. • The following edits are recommended under subsection 3.3.3 “Phase 3 – Implementation and Management Strategies”: <ul style="list-style-type: none"> ○ The following new sentence be added to the end of the paragraph beginning with “Phase 2 may also identify more detailed technical study...”: “Development of a Terms of Reference for more detailed technical study and additional work may be useful in establishing expectations among agencies and landowners”. ○ In the following paragraph, the addition of the following text: “...deferring components to the more technical local level and vice versa. Subwatershed plans undertaken for the development of greenfield areas, urban redevelopment and intensification areas or significant land use changes should include final characterization and management of watercourses, natural hazards, wetlands and other water resource system and natural heritage features to ensure an accurate calculation of developable are to meet population and employment targets and/or other land use requirements”. • Under subsection 3.3.4 “Subwatershed Plan Timelines”, it’s recommended that references to “watershed conditions” and “watershed components” be edits to read “subwatershed conditions” and “subwatershed components”.
Approval and Implementation of Plan (Step 4)	<ul style="list-style-type: none"> • It’s recommended the following bolded text be added to the second paragraph in this section: “To ensure that best science and sound technical assessments forms the basis of these land use plans...”.
Monitoring and Evaluation (Step 5) Monitoring Evaluation	<ul style="list-style-type: none"> • The following edits under subsection 3.5.1 “Monitoring” are recommended: <ul style="list-style-type: none"> ○ “Subwatershed monitoring while related to implementation monitoring, is about long-term watershed monitoring through an environmental monitoring program....It is vital that monitoring programs continue throughout the subwatershed planning process.”. ○ “The monitoring program, as laid out by the Terms of Reference for the subwatershed plan, should answer...”. • The following edits are recommended to the main paragraph under subsection 3.5.2 “Evaluation”: <ul style="list-style-type: none"> ○ “Adaptive management on a watershed and subwatershed basis includes ongoing learning...”. “Research into issues and innovations, such as addressing climate change or incorporating new development and design best practices, can be

	<p>incorporated into watershed planning in an iterative way, as watershed plans are reviewed...”.</p>
<p>4. Public Engagement</p>	<ul style="list-style-type: none"> • The second paragraph under this section speaks to the factors which will influence the nature and extent of the public engagement process. It is recommended that edits be made to clarify that the “requirements for public consultation should adhere to those under the <i>Planning Act</i>...”. • Further, following the requirements related to the <i>Environmental Assessment Act</i>, it is recommended that requirements for public consultation through regulations made under the <i>Conservation Authorities Act</i> for hazard delineation and watershed-based resource management strategies (as identified in the public engagement strategy agreed to by the partners) be included in this section.
<p>5. Indigenous Partnerships and Engagement</p> <ul style="list-style-type: none"> • What is it? • Why is it important? • How to do it? • Traditional Ecological Knowledge • Indigenous Subwatershed Planning Resources 	<ul style="list-style-type: none"> • Conservation Ontario supports the inclusion of high-level guidance and best practices to assist planning authorities in engaging and developing partnerships with Indigenous Peoples and communities. It is noted that this section of the guide is very detailed, and as such, may be better placed in a reference document or Appendix in the subwatershed planning guide. Subsections on Traditional Ecological Knowledge and Indigenous Subwatershed Planning Resources should remain in the body of the Guide.
<p>Appendix A – Key Technical Tools and Considerations</p>	<ul style="list-style-type: none"> • For consistency with the intent of the Guide, it is recommended that references be made to “subwatersheds” and “subwatershed planning”, rather than “watershed/subwatershed” in most situations. • Under the subheading for “Climate Change”, Conservation Ontario requests that “...and Conservation Authority watershed-based resource management strategies” be added to the end of the first sentence. • In addition to the sections included in Appendix A, the addition of two new sections is recommended: Natural Heritage (with a reference to the Natural Heritage Reference Manual) and Cumulative Effects (including how they can be identified and managed through subwatershed planning). Further it’s recommended that Appendix A include a reference to other technical guides which are in progress (e.g., the Low Impact Development Stormwater Management Guideline). • It should be noted in the Appendix that the water budgets that were completed at the onset of the source water protection program (in most cases over a decade ago) may not reflect new/available information of modelling approaches and evolving land uses to accurately inform subwatershed plans.