



February 8, 2007

Ms. Caroline Cosco  
Senior Policy Analyst  
Land and Water Policy Branch  
Ontario Ministry of the Environment  
135 St. Clair Avenue West, 6<sup>th</sup> Floor  
Toronto Ontario  
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**SENT BY FAX 416-314-3918**

Dear Ms. Cosco:

**RE: EBR Posting AA07E0001**  
**Amendments to the *Ontario Water Resources Act*. To Implement the Great Lakes and St. Lawrence River Basin Sustainable Water Resources Agreement**

The Great Lakes and St. Lawrence Cities Initiative (GLSLCI) is an bi-national organization of mayors committed to working together and with other governments for the protection and restoration of the Great Lakes and the St. Lawrence River.

The GLSLCI was actively involved in the consultations that led to the Great Lakes and St. Lawrence River Basin Sustainable Water Resources Agreement and supported the principle of a co-operative approach to conserving, protecting and managing the Great Lakes and St. Lawrence waters through the prohibition of new or increased diversions. Protection and restoration of this resource is of utmost importance to the mayors of cities and communities across the Basin. The GLSLCI applauded the efforts of the Provinces of Ontario and Quebec and the Great Lakes states and for their efforts and inclusive process to develop a water management system to protect the resource and serve all residents.

The GLSLCI commends the Province of Ontario for taking the lead to implement the Agreement through this regulation and proposed amendments to the Ontario Water Resources Act. The GLSLCI supports the proposed amendments to the Ontario Water Resources Act to prohibit inter-basin diversions, with limited exceptions, through legislation. The prohibition of intra-basin diversions over 379,000 litres per day, with limited exceptions is also supported. The GLSLCI supports the requirements for water conservation measures where exceptions to the inter and intra-basin prohibitions are granted and supports the Great Lakes and St. Lawrence River Basin Water Conservation and Efficiency Initiative.

It should be noted that many cities and communities have had water conservation and efficiency programs in place for a number of years with the result of significant reductions in water use. The GLSLCI water conservation program encourages more municipalities to undertake such programs and to share best practices.

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*David Miller, Mayor of Toronto, Chair*

*Richard M. Daley, Mayor of Chicago, Founding Chair*

The Province of Ontario's Permit to Take Water (PTTW) process provides the base for regulating water takings that is well advanced compared to other jurisdictions. However the process could be improved to provide for more informed decision-making by using the permits to determine the quantity of surface and groundwater water being taken on a watershed basis. Combined with the mapping and groundwater analysis required by the Clean Water Act, improved watertaking inventory will improve the overall science of the impacts and help define limits for takings on a watershed basis.

Finally, municipal planning for water and wastewater infrastructure is often 20 years or more in advance of actually construction. The Provincial commitment to sustainable water resources should be aligned with municipal planning, Provincial growth planning and provincial planning policies and statements and incorporated in master planning and environmental assessments. Imposing the controls at the end of the process will not work. As has been expressed in other forums, dedicated funding should be provided to municipalities for expansion and upgrading water and waste water infrastructure.

The GLSLCI welcomes this opportunity to comment on the implementation of the Great Lakes – St. Lawrence River Basin Sustainable Water Resources Agreement and is very interested in working with the Province of Ontario and other governments to provide the municipal voice on initiative to protect and restore the resource. Please contact me if you have questions.

David Ullrich

A handwritten signature in black ink that reads "David Ullrich". The signature is written in a cursive, flowing style.