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November 27, 2019

Naomi Herold
Ministry of the Environment, Conservation and Parks
Environmental Policy Branch
40 St Clair Avenue West, Floor 10
Toronto, ON
M4V1M2

RE: ERO 019-0545 Waterpower Exemption from Permits To Take Water

Dear Naomi Herold

The Grand River Conservation Authority (GRCA) supports the proposed exemption of waterpower facilities from attaining Permits to Take Water (PTTW) under the Ontario Water Resources Act (OWRA) and moving to a “one window” approach through provisions of the Lakes and Rivers Improvement Act (LRIA). The removal of duplicate requirements will increase efficiency for waterpower facility approvals while maintaining regulator effectiveness.

The GRCA encourages the Province of Ontario to consider further reduction in duplication by also including dams not associated with waterpower that are approved under the LRIA for exemptions from PTTW. For example, a water management dam with an established operating plan could get approval under Section 23.1 of the LRIA. This would result in a “one window” approach for all dams under provisions of the LRIA and remove duplications between LRIA and OWRA.

Additionally, the GRCA recommends that the Province of Ontario uses information from the Source Water Protection Program to further enhance the Permit to Take Water Program for water takings that are not associated with dams. The information and tools developed through Source Protection Studies provide opportunities to streamline some applications and approvals, while improving the protection of water resources in the

Province of Ontario. The GRCA is open to discussing further opportunities to align these two programs.

Please feel free to contact me if you have any questions regarding these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Stephanie Shifflett', with a small star-like mark at the end.

Stephanie Shifflett, P. Eng.
Water Resources Engineer
Grand River Conservation Authority

SS/

cc:

Dwight Boyd, Director of Engineering, GRCA
Martin Keller, Source Protection Program Manager, GRCA