



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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July 11, 2017

Mr. John Antoszek, Engineer  
Ministry of the Environment and Climate Change  
Environmental Sciences and Standards Division  
Standards Development Branch  
Water Standards  
40 St. Clair Ave. West, Floor 9  
Toronto, ON M4V 1M2

Via Email to: [john.antoszek@ontario.ca](mailto:john.antoszek@ontario.ca)

Dear Mr. Antoszek,

**Re: EBR 012-9080 Low Impact Development Stormwater Management Guidance Manual**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

Farmers are integral partners in managing the natural environment. They rely on the air, soil, and water to conduct their business, and as such have a vested interest in the sustainability of these resources. We are pleased to provide our input into **EBR 012-9080: Low Impact Development (LID) Stormwater Management Guidance Manual**.

This posting appears to be focused on urban stormwater management, however this is not stated explicitly in the document. Care must be taken to ensure that the final LID guidance document avoids unintended interpretations and consequences that negatively impact Ontario agriculture.

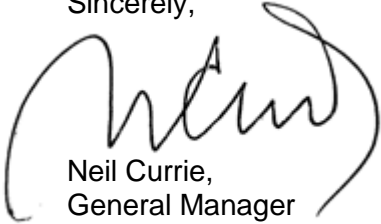
Ontario's agricultural community has been actively involved in voluntary stewardship programs for over 25 years. The agricultural community in Ontario is aware of its environmental stewardship role, and has made significant management changes that reflect this awareness. Ontario farmers are committed to continuous improvement on their farm operations. They continue to demonstrate a proactive approach to the Province's resources, including water, through the development and promotion of the Environmental Farm Plan (EFP) and several Beneficial Management Practices (BMP) documents.

The process in developing the final LID guidance document must recognize the unique nature of agriculture and credit the substantial work done by the industry in mitigating risks to the environment, including water resources. The final document must be very clear and concise in its

application to ensure that it is not open to interpretation that will be detrimental to the progress and success made within the agricultural community, particularly with regards to water management.

I trust our opinions and recommendations will be given due consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Neil Currie', enclosed within a large, sweeping, handwritten flourish that forms a partial circle around the text.

Neil Currie,  
General Manager