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Office of the Chair

Bureau du Président

May 30, 2019

Greenbelt Council

**Conseil de la
ceinture de verdure**

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5

Re. Greenbelt Council Report #6

Dear Minister Clark,

It is my pleasure to send you the Greenbelt Council's sixth progress report as we proceed through our work program.

Sincerely,

A handwritten signature in black ink, appearing to read "David Crombie".

David Crombie
Chair, Greenbelt Council

Copies to:

The Honourable Rod Phillips, Minister of the Environment, Conservation and Parks
Laurie LeBlanc, Deputy Minister, Ministry of Municipal Affairs and Housing
Greenbelt Council Members
Ed McDonnell, CEO, Friends of the Greenbelt Foundation
Karen Moore, Director, Climate Change Policy Branch, Ministry of the Environment,
Conservation, and Parks
Robyn Kurtes, Director, Environmental Policy Branch, Ministry of the Environment,
Conservation, and Parks
Deborah Martin-Downs, Chair, & Dave Burnett, Coordinator, Greenbelt Golden Horseshoe
Conservation Authority Collaborative
Kim Gavine, General Manager & Bonnie Fox, Manager, Policy and Planning, Conservation
Ontario
Tim Gray, Executive Director, Environmental Defence
Greater Golden Horseshoe Stakeholders

Greenbelt Council for the Greater Golden Horseshoe Report #6 (May 2019)

Continuing its practice of distributing progress reports after each meeting, the Greenbelt Council is pleased to share its sixth report. It communicates our work in considering matters of public interest with respect to Ontario's Greenbelt and the implementation of the *Growth Plan for the Greater Golden Horseshoe*. The Greenbelt Council is mandated by the Province of Ontario to provide advice to the Minister of Municipal Affairs and Housing.

At its meeting May 27, Council met with Karen Moore (Director, Climate Change Policy Branch, Ministry of the Environment, Conservation, and Parks) and Robyn Kurtes (Director, Environmental Policy Branch, Ministry of the Environment, Conservation, and Parks) to hear more about the Made in Ontario Environmental Plan, along with Deborah Martin-Downs (Chair Greenbelt Golden Horseshoe Conservation Authority Collaborative), Dave Burnett (Coordinator, Greenbelt Golden Horseshoe Conservation Authority Collaborative), Kim Gavine (General Manager, Conservation Ontario) and Bonnie Fox (Manager, Policy and Planning, Conservation Ontario) to hear about the roles and responsibilities of conservation authorities, and Tim Gray (Executive Director, Environmental Defence) on the potential implications of Bill 108.

The following reflects Council's deliberations on the mandate of the conservation authorities and the government's proposed changes to their roles and responsibilities through Bill 108 and the Modernizing Conservation Authorities Act.

The Greenbelt Council recommends the government reconsider and delay further action on the proposed changes to the conservation authorities' mandate as set out in Schedule 2 of Bill 108, and undertake a fulsome consultation process with stakeholders prior to the enactment of any legislation and related regulations.

We do so for the following reasons:

1. Everyone in Ontario has the right to safe, clean water and watershed management is the right way to ensure they get it

Natural water processes operate in ecosystem-based geographic units—watersheds—rather than along political boundaries. Together, Greater Golden Horseshoe watersheds form a bioregion from Lake Ontario to Lake Simcoe and from Niagara to Rice Lake encompassing the Oak Ridges Moraine, Niagara Escarpment and Protected Countryside of the Greenbelt. This bioregion is under stress from rapid urban growth where 13.5 million people are expected to live in the region in the next 20 years, all of whom need clean water to drink, access to nature, and protection from flooding. More attention to watershed planning is essential, not less.

Safeguarding water quality and quantity and conserving the natural resources within these watersheds are provincial responsibilities. Since 1946, conservation authorities whose boundaries align with watersheds have worked in partnership with the provincial

government to deliver watershed management and natural heritage conservation at the local and regional scale.

The importance of proactive watershed management has been driven home by past tragedies including Hurricane Hazel in 1954, and the Walkerton tragedy in 2000, which stand as stark reminders that we can't let down our vigilance. The dangers of poor water management are severe.

2. A safe and healthy natural environment is the foundation of a healthy economy

We have recently seen the personal and taxpayer costs of the floods that ravaged the province this spring. Watershed management through Ontario's conservation authorities—in partnership with municipalities and the Province—provides an efficient and cost-effective means to address environmental problems affecting public health and safety and threatening Ontario's economy.

The watershed approach to planning and management needs to continue to be ingrained in the provincial regulatory and policy framework as a core mandate of the conservation authorities. Municipalities need the services that conservation authorities provide and must not be able to opt out of being a partner in providing essential services for the health and well-being of residents and ultimately the economy. Otherwise residents can anticipate harm to the province's long-term prosperity, prosperity that is dependent on the sustainability of our biodiverse natural areas.

3. Watershed management is good for residents, business and developers

Watershed planning is an ecological, partnership and economics-driven approach that has been incredibly successful across the GGH. Healthy watersheds contribute to the protection of people and property from flooding and other natural hazards. They support sustainable water use and water security for future generations, as well as biodiversity and natural heritage.

Watershed planning and management adds value to the development process. Protecting the environment helps to protect landowners' assets. In areas where watershed and sub-watershed plans have been completed, these documents identify potential liabilities that may otherwise result in exceptional risks or lost opportunities.

Conservation authorities monitor watersheds to determine the health of the system. The data collected through these processes are critical to decision-makers at all levels of government, as well as business and non-governmental organizations. Conservation authorities have maintained or expanded monitoring stations on behalf of the provincial or federal government for surface and ground water quality and quantity, climate, vegetation, flora and fauna. This data informs decisions today and enables modeling to assess the impacts of future land uses, activities and policies. Information gathered and assessed at the watershed or sub-watershed scale can help to prevent or mitigate flooding, for example.

4. Conservation authorities help municipalities avoid large, costly infrastructure projects

Conservation authorities identify and address issues and concerns that cross municipal jurisdictions. They facilitate the use of shared watershed knowledge (rather than recreating data through separate studies), provide technical expertise (reducing duplication in municipal staff), coordinate implementation and help to leverage resources. As a result, conservation authorities offer a larger scope of actions to solve or mitigate issues than would be feasible by individual municipalities. For example, planting at the headwaters of Duffins Creek is more efficient and less costly than flood remediation in Ajax; and implementing rural water quality programs which reduce or prevent phosphorus from manure polluting waterways upstream in one municipality is less costly than adding tertiary sewage treatment downstream in another.

Another municipal challenge is stormwater management, particularly in terms of flood mitigation, and the protection of fresh water from contaminants. Evaluating the most cost-effective infrastructure solutions to stormwater runoff among municipalities within a shared watershed can help to improve water quantity and quality control and enhance system resiliency.

5. Conservation authorities can help to enhance agricultural productivity and food security

Council agrees with the recommendations in the 2016 report of the Advisory Panel chaired by Greenbelt Council chair David Crombie—*Planning for Health, Prosperity and Growth in the Greater Golden Horseshoe: 2015-2041*—supporting agriculture viability, productivity and food security. In this regard conservation authorities can play an important role working with the Province and local authorities to assist in this work while maintaining the integrity of natural features and system.

6. The approval process can be made more efficient

Improvements to approval processes can and should be made in order to gain efficiencies. In addition to process improvements relating to development and permit review, administrative silos could be eliminated and designated tasks could be better aligned with existing capabilities of both conservation authority and provincial staff. This could reduce duplication, shorten timelines and leverage the conservation authorities' expertise. Areas for consideration include permits under the *Endangered Species Act*, Environmental Compliance Approval, or Permit to Take Water processes. Similar service delivery integration was undertaken with the federal Department of Fisheries and Oceans to ensure smooth delivery through the permit stage.

The Greenbelt Council is concerned that changes to governance and land-use planning in the Greater Golden Horseshoe are being taken in an ad hoc fashion. More time for the government to understand how changes in one area affect other areas of provincial responsibility is needed. For example, changes to conservation authorities' mandates are premature until the regional government review is completed. More time for public consultation is needed. And more time for the government to respond to public input is needed.