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May 13, 2011

RE: Addressing Urbanization and the Regulatory Flood Hazard

This letter is being sent at the direction of Conservation Ontario Council, who passed the following resolution at their meeting on April 18, 2011:

WHEREAS it is now understood that upstream urbanization has the potential to increase flood risk in downstream areas,

And WHEREAS the technical guidance provided by the province for the establishment of flood hazard limits specifically prohibits the consideration of stormwater management facilities in the establishment of flood hazard limits,

AND WHEREAS Conservation Ontario supports that such facilities, in conjunction with other measures and mechanisms such as land acquisition and flood remedial works in affected downstream areas, could be implemented by municipalities, with support from conservation authorities and the province and as part of a risk-based, watershed-scale approach to the mitigation of impacts from development on the regulatory flood hazard,

And WHEREAS design standards and methodologies for stormwater management detention facilities, whose function could be recognized in the delineation of flood hazard limits, must be developed in partnership with the province and affected municipalities and incorporated into an update of the 2002 MNR Technical Guide,

THEREFORE BE IT RESOLVED THAT the Ministry of Natural Resources be requested to initiate appropriate steps, in conjunction with conservation authorities, municipalities and other key stakeholders to develop a feasible and cost-effective solution to this issue in a timely manner.

The resolution was the result of Council's consideration of the attached paper entitled, "Issue Exploration- Urbanization and Regulatory Flood Hazard", authored by Toronto and Region Conservation Authority (TRCA) staff with input from a number of conservation authorities. The Issue Exploration examines the effect that urbanization is having on flood hazards, particularly in light of the Province's policy regime of growth planning and intensification.

As it is now understood that upstream urbanization has the potential to increase flood hazard limits in downstream areas, the purpose of this letter is to request that the Province provide specific direction on how to address the flood impacts which are occurring as a result of urbanization. The issue has been raised verbally at a number of provincial and CA tables and the attached paper documents the issue and is intended to provide the necessary detail and sufficient context to facilitate the ability of the Ministry of Natural Resources to confirm and initiate appropriate next steps.

Conservation Ontario considers it critical that multiple stakeholders including conservation authorities, municipalities and other interested parties (e.g. Ministry of the Environment, Ministry of Municipal Affairs & Housing) be involved in the resolution of the issue. Conservation Ontario would be pleased to identify appropriate CA staff to assist in this regard. It is noted that while not specifically a Greater Golden Horseshoe (GGH) Growth Plan Area issue, several active planning initiatives in the GGH Growth Plan area are predicted to impact regulatory flooding as described in the attached paper, thus creating a more urgent need for collaborative action on this issue.

Thank you in advance for your consideration of this issue and I'd appreciate an opportunity to further discuss next steps and your timing at the earliest opportunity.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Pearson". The signature is fluid and cursive, with a large initial "D" and "P".

Don Pearson
General Manager

c.c. CAOs/GMs of Conservation Authorities