



May 28, 2015

Richard Stromberg
Ministry of Municipal Affairs and Housing
Ontario Growth Secretariat
777 Bay Street
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RE: Conservation Ontario's Comments on the "Co-ordinated Review of the Growth Plan for Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan" (EBR# 012-3256)

Mr. Stromberg:

Thank you for the opportunity to provide comments on the "Co-ordinated Review of the Growth Plan for Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan" (EBR# 012-3256). Conservation Ontario is the network of Ontario's 36 Conservation Authorities (CAs). These comments are being provided to you as a result of consultation with CA planning staff who have extensive experience working within the framework of the Growth Plan (GP), Greenbelt Plan (GB), Niagara Escarpment (NEP) and/or the Oak Ridges Moraine Conservation Plans (ORMCP). These comments are not intended to limit consideration of comments shared individually by Conservation Authorities through the Provincial Co-ordinated Review process.

General Comments

Conservation Authority Contributions to the Implementation of the Provincial Plans

In their role as watershed management agencies, Conservation Authorities provide support for implementation of the four provincial plans. Conservation Authorities help the Province and municipalities to reach the objectives of the provincial plans through their delegated responsibilities around flooding and other natural hazards; their watershed management roles; as service providers to their municipalities and as one of the largest landowners in Ontario.

While a watershed approach is promoted throughout the four plans, the role of Conservation Authorities in helping to achieve the goals and objectives of the provincial plans has not been acknowledged to any great degree. Further support for integrated watershed management, and the important role that CAs play in implementing the plans, should be incorporated into the planning documents moving forward. For example, the plans should be amended to include the CA role in watershed planning, technical review and monitoring programs wherever appropriate. In addition, the plans should acknowledge the implementation role of CAs in provision of review comments in

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conformity with the plans to municipal approval authorities including CA support in natural heritage identification, mapping and impact assessment.

Integrated Watershed Management

The Oak Ridges Moraine Conservation Plan has been instrumental in supporting and requiring municipalities to undertake subwatershed plans for natural systems within the plan area. It is recommended that the Province pursue further opportunities to better align the GP, GB and NEP with the ORMCP to incorporate integrated watershed management (IWM) as a requirement. IWM provides an integrated comprehensive planning tool which allows municipalities to undertake community planning at a broader scale, while accounting for infrastructure to support growth, protecting what is valuable and managing growth in a sustainable manner. Requiring watershed plans to be undertaken throughout each plans' geography would support ensuring that the watershed is used as the ecologically meaningful scale for integrated and long-term planning –providing for the foundation of considering potential and cumulative impacts of development and other stressors on natural systems.

Green Infrastructure and Low Impact Development

A key to integrated planning is the incorporation of green infrastructure, including the use of Low Impact Development (LID) measures for new and existing communities. The plans should be amended to promote the use of green infrastructure whenever possible. Green infrastructure can extend the life of many types of traditional infrastructure, can be implemented at multiple scales, and there is flexibility as to when and how it is integrated into developed areas. The benefits of green infrastructure include providing greater resilience to the potential impacts of climate change, stormwater retention, erosion control and improved air and water quality.

Moving forward, there is an opportunity to further promote the use of innovative green infrastructure throughout the Province as a means to address new and emerging issues, including climate change adaptation and mitigation and Great Lakes protection. In addition, green infrastructure may also mitigate the impacts associated with watershed stressors such as urbanization and increasing demands on urban and rural natural heritage systems. It is also well documented that green infrastructure and LID measures can be a key component in moving forward with strengthening a Provincial approach to supporting attractive, livable and healthy communities.

The following comments are numbered/lettered according to the Provincial consultation questions on the four Provincial Plans.

Question 1: How can the plans better support the long-term protection of agricultural lands, water, and natural areas?

Watershed Based Planning

As noted above, the use of integrated watershed management to sustain the long-term protection of provincial priorities including agricultural lands, water, and natural areas, is recommended. Watershed based management principles that include all headwater catchment areas is currently only required in the ORMCP. The NEP, GP, and GB should be amended to support protecting these important water resources. By using a watershed based approach to planning, targets can be developed based on the capacity and thresholds of the system. IWM may also provide a mechanism to address cumulative impacts associated with development and a more adaptive approach to addressing climate change. To date, the Growth Plan has allocated growth in areas where the cumulative impact of development may be threatening overall watershed health. Consideration of the subwatershed/watershed plan in the growth of existing communities and greenfield development may ensure that sustainable stormwater

management practices (including LID) are implemented to further mitigate potential cumulative impacts.

Natural Heritage System Planning

In addition to watershed planning, the four plans could further recognize the importance of planning for natural heritage systems at various scales. Currently, policies in the plans provide a framework for identifying key linkages at the provincial scale, however, Conservation Authorities and municipalities often identify complimentary watershed and local scale natural heritage systems which provide for further protection based on the unique needs of individual communities. It should be acknowledged that although local features and areas may not appear to provide key functions at a larger scale, they do provide significant benefit at the local scale. This local-scale benefit is reflected in the updates to the 2014 PPS. It is recommended that the plans should be updated to encourage natural heritage systems at various scales.

Strengthening protection policies for key natural heritage features and hydrological features to mitigate cumulative impacts should also be considered – particularly in light of the need to increase natural heritage system resiliency to be better positioned to adapt to climate change. Managing for ecosystem integrity and function is critical and should be identified consistently throughout all four plans to handle the continued and expected growth in the Province while aiming to lessen the associated impacts.

The four plans should better promote an integrated systems planning approach to incorporate natural heritage systems, open space lands and green infrastructure to help manage stormwater, mitigate the potential impacts of climate change, provide resiliency and increase recreation opportunities in light of intensification in the Greater Golden Horseshoe. Wherever possible, the plans should highlight the importance of maintaining linkages and identifying, protecting and enhancing natural heritage systems needed to support the health and wellbeing of new and intensifying communities.

Large-Scale Fill

Since the plans' inceptions, and in part due to the intensification and redevelopment precipitated by the Growth Plan, there has been a growing movement of commercial fill throughout the province, which is generally regulated outside of the planning and environmental assessment processes. In order to ensure consistency and the representation of the provincial interest through the implementation of the provincial plan policy framework, it is recommended that the plans be amended to require that municipalities have site alteration/fill and tree protection/ cutting by-laws which are consistent with these plans. The Growth Plan should promote the beneficial reuse of excess soil, including encouraging local projects to share excess soil whenever possible.

- a. How can the plans better direct urban development to areas already developed?

The planning process should take place in advance of the determination of settlement boundaries and the approval of *Planning Act* applications should only occur after the approval of a detailed environmental assessment(s) which illustrates that the planned expansion of settlement areas or intensive redevelopment is feasible. In general, many infrastructure upgrades are required in advance of development occurring. These upgrades include roads, bridges, wastewater treatment, pumping stations and water treatment plants. There is pressure to accelerate the EA process and to move quickly on approving the municipal EA documents to accommodate the growth. Unfortunately, at times, this results in significant differences between the EA documents and the subsequent design and

construction drawings, resulting in a delayed permitting process under the *Conservation Authorities Act*. The Growth Plan should be modified to include a greater emphasis on the completion of appropriate environmental studies prior to approving new development.

The Province should consider strengthening the tools in the Growth Plan regarding settlement area expansions and land budgeting by ensuring that future settlement area expansions are only permitted based on a watershed scale analysis that considers the applicable watershed plan(s), the cumulative effects associated with additional urbanization and expansion, and confirmation that assimilative capacity is present to maintain the ecological and hydrological integrity of the watershed. The plans can better direct urban development to already developed areas by requiring the municipal land use planning process to simultaneously identify the constraints of the area (i.e. natural hazards, natural heritage). This should be done using the best available science and Conservation Authorities, where resources allow, could assist.

- b. Where are the opportunities to expand the Greenbelt both within urban areas, such as urban river valleys, and in rural areas beyond the Greater Toronto Area?

Further consideration to expanding the urban river valley designation to include valley lands outside of public ownership should be given. The inclusion of private lands within the urban valley designation would be more consistent with the Province's system approach to planning, and provide for opportunities to fill in existing connectivity gaps in the current designation system. The Province should also consider taking advantage of existing landuse planning exercises to expand the Greenbelt. For example, the Kawartha's Naturally Connected (KNC) Natural Heritage System, which is currently being developed through a partnership initiative with the Ministry of Natural Resources and Forestry (MNRF), City of Kawartha Lakes, Durham Region, Peterborough County, Kawartha Land Trust, Kawartha Region Conservation Authority, Otonabee Region Conservation Authority and a number of other stakeholder organizations provides an opportunity to expand the natural heritage system of the GB and at the same time, preserve an agriculturally important landscape.

Finally, prior to the expansion of settlement areas, policy 4.2.1 'Natural Systems' of the Growth Plan should be implemented. When settlement areas are expanded, the Province should consider complementary expansions to the Greenbelt to the associated urban river valleys and open space systems within the settlement expansion area. Finally, it is recommended that policy 4.2.1 of the Growth Plan be amended, to include the external connection policies contained in policy 3.2.5 of the Greenbelt Plan.

- c. What new approaches or tools could be used to protect agricultural land, water and natural areas?

New approaches or tools that could be used to protect agricultural land, water and natural areas include: adopting an integrated watershed management approach (as per comments above) and a consistent environmental monitoring and reporting platform, for example, the CA watershed report cards; addressing the transport and management of large-scale commercial fill (as per comments above); requiring that municipal tree-cutting by-laws be consistent with the plans; and the incorporation of policies in the plans that would encourage municipalities to offer incentives to developers to protect, maintain and/or enhance water and natural areas. The Province should put a greater emphasis on the

range of tools which can support the implementation of the plan objectives. These additional tools could include increased funding for stewardship activities, payment for ecological services, support for public land acquisition and providing carbon credits for permanent expansions to natural heritage features and systems.

The Growth Plan should provide better direction with regard to safeguarding our water resources as a result of intensification. As development moves ever closer to the ORM-Greenbelt, CA practitioners are aware that development projects are increasingly running into unexpected groundwater issues with their foundations or underground parking structures. There have been many groundwater studies done at the regional level, but not a site specific level. Without clear direction in the Growth Plan that these studies are required, many of the studies that are currently undertaken are too limited in scope. When groundwater issues arise, the preferred solution often is the permanent and continuous dewatering of the aquifer. This solution can have potential consequences for features-based water balance where the groundwater regime is supporting wetlands, woodlands and cold water fisheries. It can also have erosion and thermal impacts if there is significant surface discharge of the groundwater to a receiving watercourse. Finally, there is concern regarding potential silting and clogging of municipal stormwater drainage systems and the “wasting” of a precious groundwater resource.

The plans should seek to balance flexibility and protection. The Province should develop a broader definition of agriculture and its activities to encourage innovation while maintaining the plans’ integrity with regard to protection of water resources and natural areas. The land use planning process could potentially identify and/or encourage value-added agricultural activities. There are a number of policies where study requirements could be scoped to meet the needs of the development and the protection of the environment, for example, allowing for some flexibility when implementing Policy 24(4)(c)¹ of the ORMCP as it relates to major development where there is no water taking component (i.e. barns).

- d. How can we grow and strengthen the region’s network of open spaces to provide for recreational opportunities?

To grow and strengthen the region’s network of open spaces to provide for recreational opportunities the Province should make strategic investments in land securement for public purposes (i.e. Conservation Areas). The Province should also map open space and trail networks and create an implementation plan with corresponding funding for land acquisition aligned with municipal, regional and Conservation Authority strategies and landholdings.

- e. How can the agricultural protection that the plans provide enhance the impact of agriculture on Ontario’s economy?

The agricultural protection that the plans provide enhance the impact of agriculture on Ontario’s economy by protecting prime agricultural lands close to market. Outside of these plans, the Province should develop programs and other support materials to help farmers market and expand their

¹ 24 (4) (c) - Major development is prohibited unless,

(c) a water budget and conservation plan, prepared in accordance with section 25 and demonstrating that the water supply required for the major development is sustainable, has been completed.

operations. Additionally the plans should ensure protection of the watershed systems that provide sustainability of the agriculture system including both the natural heritage and water systems which are mutually dependent for provision of ecological services such as erosion control, soil retention and water quantity and quality for irrigation and livestock.

Question 2: How can the plans be strengthened to ensure our communities make best use of key infrastructure such as transit, roads, sewers and water?

The Growth Plan's objectives are supported and can only be achieved through balancing all aspects of sustainability (environmental, social and economic). Additional tools that the Province should consider to ensure our communities make best use of key infrastructure such as transit, roads, sewers and water include the creation of a sustainable funding model to support the municipalities in the application of best management practices to address natural hazards and stormwater on the landscape, as well as to encourage innovative water conservation techniques and natural heritage systems identification and mapping.

To increase efficiencies in the use of existing and proposed infrastructure, the four plans should continue to include policies that focus on intensification and directing development to existing serviced urban areas and brownfield redevelopment, outside of natural hazard and natural heritage areas. The plans could also encourage the integration of compatibility of land uses with the necessary infrastructure; there should be an emphasis on assessing retrofit potential, particularly using LID practices.

With the anticipated approval of the Source Protection Plans it is recommended that the Province undertake a thorough review to ensure that there aren't any incongruous clauses within the provincial plans and to streamline where appropriate. The science used to inform the Source Protection Plans should be used to update the plans and mapping, where it is the best available to protect our water resources.

c. How can the plans align long-term infrastructure planning with planning for growth?

The Growth Plan does a good job of acknowledging the need for hard infrastructure and servicing within communities however it fails to acknowledge the need to ensure that municipalities can accommodate the additional servicing capacity without compromising the ecosystem functions on which some of this servicing depends. When directing growth, the capacity of the watershed should be considered, including the resource-based targets established in subwatershed plans and other studies. Some municipalities have environmental constraints (e.g. the availability of water in the City of Guelph, downstream flooding and erosion in communities with well-defined valley features) and development must occur coincident with environmental sustainability. Conservation Authorities could assist the Province with identifying sustainable limits to growth by providing data, analysis and recommendations collected through their natural heritage studies, monitoring programs and subwatershed planning exercises. The Growth Plan should provide direction on how environmental sustainability is to be achieved in tandem with accommodating growth and Conservation Authorities have information which can support this analysis.

Similarly, it is recommended that the transportation, infrastructure and utilities policies in the plans be revised and harmonized. The plans could provide context for Environmental Assessments. Further

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direction should be provided on “no reasonable alternative” and policy requirements should be added for enhancement and compensation when key natural heritage or hydrologic features are negatively impacted.

e. How can the plans identify and better protect the strategic infrastructure corridors needed over the long term?

The plans can better identify and protect strategic infrastructure corridors needed over the long term by requiring the Province, in partnership with municipalities, Conservation Authorities and other stakeholders to proactively identify corridors for linear infrastructure at the landscape level. The plans should promote this approach, identify what factors need to be considered when designing corridors, and contain policies related to the construction of infrastructure within the corridors (as per the comments above) to help promote efficient and sustainable growth.

f. How can the plans better balance the need for critical infrastructure to support economic growth with environmental protection?

The plans can better balance the need for critical infrastructure to support economic growth with environmental protection by strengthening the “need” and “no reasonable alternative” tests in the plans. Where an infrastructure proposal intercepts with an identified natural heritage feature or water resource feature, the plans should identify an acceptable range of offsetting measures such as compensation, enhancement and habitat banking. These offsetting measures should be built into master planning and environmental assessments for infrastructure development through specific requirements in the plans.

Question 3: How can the plans continue to support the design of attractive, liveable and healthy communities that are accessible to all Ontarians at all stages of life?

The plans can continue to support the design of attractive, liveable and healthy communities that are accessible to all Ontarians at all stages of life, through the promotion of natural heritage system planning and the promotion of green infrastructure and low impact development. In this regard, the plans should provide further clarity and requirements for natural heritage systems developed within existing urban, urbanizing and “white belt” areas. Articulating the need for urban natural heritage systems (including green infrastructure such as valley lands) through requiring strong linkages and increased resiliency through taking advantage of retrofit opportunities, thus lowering management costs, and the development of more sustainable urban centres should be encouraged. Stronger requirements and consistency throughout the four plans for incorporating green infrastructure and LID into community planning would also support the design of attractive, liveable and healthy communities, while simultaneously promoting a holistic and integrated approach to water management in the plan areas.

- a. How can the plans provide more direction on designing:
 - i. Communities that have the right layout and mix of parks, natural areas, public spaces and people-focused streets?

Ontario's 36 Conservation Authorities collectively own and operate over 500 Conservation Areas with a total area of 145,357 hectares, making CAs one of the largest property owners in the Province. Conservation Areas are visited by almost seven million people each year. In order to enhance the acquisition of land for the public good, the plans should expand the range of tools that are available for this aim and should support the agencies and groups that protect lands. Given that Rouge Park will shortly become Canada's first national urban park, the plans should continue to build upon the policies put into S. 3.2.6 of the Greenbelt Plan for the protection of Rouge Park. It is recommended that the Province continues to emphasize management planning and incorporate similar provisions for publicly managed land outside of the Rouge Park area. The Province should also provide more flexibility within the plans to allow for lot creation for conservation purposes, as well as to facilitate conveyances to public bodies for cultural heritage landscapes and structures, in addition to the existing provisions for natural heritage conservation.

Finally, prior to the expansion of settlement areas, policy 4.2.1 of the Growth Plan should be implemented. When settlement areas are expanded, the Province should consider complementary expansions to the Greenbelt to the associated urban river valleys and open space systems within the settlement expansion area. Finally, it is recommended that policy 4.2.1 of the Growth Plan be amended, to include the external connection policies contained in policy 3.2.5 of the Greenbelt Plan.

c. How can the plans better protect heritage buildings, cultural heritage landscapes and archaeological resources?

The plans can better protect heritage buildings, cultural heritage landscapes and archaeological resources by ensuring that there are complementary lot creation policies to support those objectives. Conservation Ontario urges the Province to take the review of the plans as an opportunity to review land securement processes in the plan areas. The Province should encourage public ownership of property by investing in and providing funds to support public land acquisition and appropriate management. The Province can consider supporting public land acquisition by providing funding or by supporting regional securement programs as the basis for identifying lands and working in cooperation across agencies to secure and manage these lands in the future.

In addition, there should be greater flexibility in the tax programs available to support public agencies in managing property. For example, tax breaks are provided for forest management under the Managed Forest Tax Incentive Program, but similar incentives are not available for active meadow management, which could be considered cultural heritage landscapes. This makes managing some habitats more expensive than others from a property tax perspective.

Question 4: How can the plans better support the development of communities that attract workers and the businesses that employ them?

To better support the development of communities that attract workers and the businesses that employ them, the Province should consider the creation of a sustainable funding model to support municipalities in the application of best management practices to encourage innovative water conservation techniques and natural heritage systems identification and mapping. The four plans should continue to expand upon policies that support the use of green infrastructure and LID methods as the use of these techniques supports local economic development.

c. How can the plans balance the need for resource-based employment, including the agri-food and mineral aggregates resource sectors, with protecting the natural environment?

The plans should seek to balance flexibility and protection. The Province should develop a broader definition of agriculture and its activities to encourage innovation while maintaining the plans' integrity with regard to protection of water resources and natural heritage. The land use planning process could potentially identify and/or encourage value-added agricultural activities. The *Local Food Act* also provides another great opportunity for the Province to integrate provincial priorities. In addition to promoting good relationships between producers and consumers, the reduction in the distance between farm and market means that fewer emissions are produced through transportation. The application of farming 'best management' practices can help the Province to further protect the natural environment and reduce emissions; concentrating research and spurring innovation in this sector could result in Ontario being a world-wide leader. As an added benefit, local production also promotes food security.

The plans should contain appropriate policies that balance the need for resource extraction with the protection of natural heritage features and water resources. For example, the plans could provide for extraction operations subject to an appropriate compensation plan on a net gain basis to enhance the systems which may be affected by the activity. A proposal for offsetting compensation should be required as part of the approval process. The plans should consider the effects and the appropriateness of large site disturbances on linkages and natural heritage system areas associated with aggregate operations and commercial fill operations, and refine the policies to provide more precise direction on how to protect the natural environment. At a landscape level, the Province should apply a strategic approach to identifying areas of unexploited high potential aggregate where extraction operations would have the least amount of impact on the natural heritage features and water resources of the Province.

Question 5: How can the plans help address climate change?

The plans can help address climate change by providing further guidance as to how and where growth will occur through the use of integrated watershed management. In general, Conservation Ontario encourages the Province to adopt an integrated systems planning approach to incorporate natural heritage systems, open space lands and green urban design technologies (including green roofs, permeable pavement, etc.) to help manage stormwater, mitigate the potential impacts of climate change, and provide resiliency in light of intensification in the Greater Golden Horseshoe. Wherever possible, the Growth Plan should highlight the importance of maintaining linkages and identifying, protecting and enhancing natural heritage systems needed to support the health and wellbeing of new and intensifying communities.

The Province has been and will be very active in updating their land use planning documents in the coming years. The 2014 Provincial Policy Statement (PPS) did a good job of integrating climate change considerations however implementation support has yet to be produced, resulting in a wide and disparate range of implementation at the local level. One of the outcomes of this plan review could be a commitment to producing the required implementation support material for the PPS. A corresponding update to MNRF's natural hazard technical guides is also required. This review could provide an opportunity to incorporate climate change considerations directly in the provincial plans.

The MOECC has also recently prepared a Climate Change Discussion paper. The updated plans should ensure that the results of the MOECC consultation process are incorporated. This would include promoting an adaptation to climate change philosophy, particularly in terms of planning, infrastructure, water management and natural heritage systems. Coordinating the climate change discussion to include all these plans and initiatives and vice versa would improve the awareness and understanding of the need to limit emissions and the equally important role of adaptation and resiliency in addressing climate change.

- a. How can the plans contribute to reductions in greenhouse gas emissions?

The plans can contribute to reductions in greenhouse gas emissions by continuing to require intensification and promote landscape level planning which identifies transportation and natural heritage corridors. The plans should continue to protect and expand natural heritage systems and features to provide carbon sinks, including a recognition of the importance of headwater areas. The plans should also require green infrastructure and promote green building design to reduce energy and water consumption. Finally, the plans can contribute to reductions in greenhouse gas emissions by providing opportunities for protection, enhancement and restoration of adjacent natural systems and the implementation of green infrastructure as part of redevelopment and intensification proposals.

- b. How can the plans provide more direction on building resilient communities that can withstand extreme weather events related to climate change?

Conservation Ontario is concerned about the perceived conflicting policy objectives with regard to intensification in urban core areas as directed by the Growth Plan and the natural hazard policies presented in the PPS. In general, intensification in the built-boundaries should be directed outside of natural hazard areas to be consistent with other provincial policy objectives. The PPS provides a hierarchy of response for proposed development in areas prone to flooding, however, the Growth Plan is silent on how to integrate natural hazard policies into urban core area intensification. This results in conflicting provincial policy objectives and increases implementation challenges. The Growth Plan generally needs to be updated with further detailed direction on Special Policy Areas (SPAs), flood vulnerable areas (FVAs) and natural hazard issues in relation to redevelopment and intensification, especially in urban growth centres. The current SPA guidelines need to be updated to provide Growth Plan and PPS implementation support.

The Growth Plan should require comprehensive flood risk assessment plans and reiterate the need for flood remediation in existing FVAs and SPAs. Other tools that the Province should consider include the need for infrastructure to mitigate known natural hazards, and to address the existing infrastructure deficit. The plans should also be augmented with a guiding principle that no increase in the level of flood risk due to intensification will be permitted.

As noted above, updated technical guidance is required to help to adapt to the changing climate. The provincial plans could require planning for natural hazards to be based on climate change scenarios including infrastructure design standards and updated floodplain mapping standards.

- c. Is there a need to consider new policy approaches in the plans to increase the resiliency of our communities by reducing the development pressures on natural areas, open spaces and flood prone areas?

See response to 5b for details on what is needed for flood prone areas to increase the resiliency of our communities.

There is growing pressure on watercourse buffers, hedgerows and wetlands through their conversion to agricultural lands. Natural heritage systems and agricultural systems can be mutually beneficial, and the Province is encouraged to consider other tools which can enhance the plans' objectives, including provincial funding for land acquisition, farm best management practices and payment for ecological services. Conservation Authorities, as watershed and partnership-based implementation bodies, are uniquely positioned to deliver these services.

The Province should also consider strengthening the tools in the Growth Plan regarding settlement area expansions and land budgeting by ensuring that future settlement area expansions are only permitted based on a watershed scale analysis that considers the applicable watershed plan(s), cumulative effects associated with additional urbanization, the cumulative effects of the expansion and confirmation that the assimilative capacity is present to maintain the ecological and hydrological integrity of the applicable watershed(s).

New policy approaches to promote the resiliency of our communities could also include the promotion of sustainable forest management (SFM), as it can play a key role in managing natural heritage areas that are identified and protected in the plans. SFM is a key element of managing increasingly pressured and isolated natural heritage areas. The provincial plans should support SFM practices and promote these practices as complementary to afforestation initiatives offered through provincial programs to help counter the impacts of climate change. The plans could be significantly improved by the inclusion of a consistent approach to defining SFM including where and how it can be used and promoting its uses as a sound form of habitat management.

Questions 6: How can the implementation of the plans be improved?

- a. Are there opportunities to better align key components of the plans with each other, and with other provincial initiatives? Are there ways to reduce overlap and duplication?

Clarity for applicants and practitioners could be achieved through the harmonization of terminology and interpretations between the plans. Once harmonized, the Province should consider providing implementation training workshops/webinars on interpretation of the plans to encourage consistency. The Province could maintain a website of policy direction for applicants and practitioners to reference.

As a component of harmonizing the terminology and interpretations of the plans, updates to the technical papers that support the implementation of the plans will be required. In order to streamline the process, it is recommended that the technical papers should support interpretation across all of the plans. This will address the current inconsistencies in the technical papers, such as the protection of small woodlots adjacent to wetlands in the GB and ORMCP.

When updating the terminology, mapping and interpretations across the plans, the best available science, mapping and field investigations should be used. For example, it is recommended that the Source Protection Assessment Reports may be a suitable replacement for mapping of Wellhead Protection Areas and Areas of High Aquifer Vulnerability in the ORMCP. It is also recommended that an analysis be undertaken to determine if Section 28 and Section 29 of the ORMCP are now redundant if they are superseded by approved Source Protection Plans as part of a streamlining exercise.

As part of future ten year reviews, if the Province chooses to update plan, designation and feature boundaries, then it should be done based on scientific methodology, consistent criteria and using a transparent process. In future mapping exercises, the Province should put more emphasis on the sharing and synthesizing of information from all stakeholders, including Conservation Authorities. Section 10 (10) of the ORMC Act, which prevents appeals of the Minister's decision on conformity amendments, should be maintained and extended to conformity amendments for the GP, GB and NEP.

Finally, a review of the plans should be undertaken with respect to better integration with other key provincial initiatives. As previously mentioned, the plans should incorporate the natural hazard and climate change direction from the PPS, science and direction from Source Water Protection Plans and recent regulatory changes with respect to the Endangered Species Act (ESA).

b. What policies of the plans do you feel have been successful and should be retained?

There are numerous policies that have been cited in this submission as being recommended for extension across the four plans. As well, Conservation Ontario feels that the following policies have been successful and should be retained: the establishment of permanent land use designations for Natural Core Areas, Countryside Areas, Natural Linkage Areas and the Protected Countryside with specific permitted uses; requirements to identify specific natural heritage, hydrologic and landscape features and to protect them along with prescribed minimum vegetation protection zones; and, the incorporation of watershed scale and regional scale natural heritage systems.

c. Should the province develop any additional tools or guidance materials to help support implementation?

In addition to the resources identified above, through conversations with CA partners, it is evident that there are many misconceptions about the plans and their application with the general public. The implementation of the plans, while successful in achieving the plans' objectives, is confusing to people. The Province is urged to develop a communications strategy which emphasizes the positive work that the plans enable as well as guidance material that will be of assistance to applicants within the plan areas.

d. Are there any opportunities to better facilitate implementation?

Planning Act applications are the primary implementation tool for the Greenbelt and Oak Ridges Moraine Conservation Plans but in these plan areas, opportunities for major development are limited. Therefore, in order to enhance and restore the plan areas, through the provincial plan review, the Province should put a greater emphasis on the range of tools which can support the implementation of the plan objectives. These additional tools could include an integrated watershed management approach/subwatershed plans, increased funding for stewardship activities, payment for ecological

services, support for public land acquisition and making certain municipal by-laws (such as site alteration and tree-cutting) are prescribed instruments of the plans.

Finally, the Province should provide more guidance with regard to the hierarchy of policies amongst the plans.

Thank you for the opportunity to provide comments on the “Co-ordinated Review of the Growth Plan for Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan” (EBR# 012-3256). Given that CAs are a commenting body in both the planning and environmental assessment processes necessary to implement the provincial plans, and the extensive knowledge of CA planning staff regarding both the planning process and their local watersheds, Conservation Ontario is uniquely positioned to provide valuable input into this review process. Conservation Ontario is strongly supportive of the continued implementation of these plans and looks forward to a continued dialogue as the Province completes its ten year review. Should you have any questions about this letter, please contact myself (ext. 223) or Taylor Knapp (ext.226).

Sincerely,

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

Bonnie Fox,
Manager, Policy and Planning