



January 28, 2019

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Re: Conservation Ontario's comments on Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan (ERO#013-4208)

Thank you for the opportunity to provide comments on the Made-in-Ontario Environment Plan (ERO#013-4208). Conservation Ontario is the network of Ontario's 36 conservation authorities (CAs). These comments are not intended to limit consideration of comments shared individually by CAs through the Environment Plan consultation process.

Conservation Ontario commends the Province on its creation of the Made-in-Ontario Environment Plan to address the Province's serious environmental challenges. CAs are local watershed management agencies that deliver programs and services that protect and manage water and other natural resources in partnership with government, landowners and other organizations. CAs are legislated under the *Conservation Authorities Act* with a mandate to ensure the conservation, restoration and responsible management of Ontario's water, land and natural habitats. As the province's second-largest landowners, CAs operate under this mandate by enabling and implementing programs that protect sensitive environmental areas such as wetlands, protect life and property from natural hazards, monitor and report on watershed health, and provide educational and recreational programs to inform and build appreciation for the natural environment. CAs work with municipalities to develop unique, local-level solutions that meet their needs while oftentimes supporting broader provincial interests. CAs are also legislated under the *Clean Water Act* to function as source protection authorities, supporting the protection of our municipal drinking water sources.

Conservation Ontario supports the guiding principles identified in the Environment Plan. As watershed management agencies with significant knowledge and expertise pertaining to the hydrological and ecological systems in their watersheds, CAs represent an important partner in implementing this Plan. For each of the three guiding principles identified in the Plan, CAs can support fulfilling them as follows:

**Clear Rules and Strong Enforcement**

CAs regulate development in and near wetlands and natural hazard lands under the *Conservation Authorities Act* and Ontario Regulation 97/04. They enforce the regulation through their compliance programs which help to prevent public safety issues while also protecting some of Ontario's natural features. CAs could more effectively support the Province consistent with this guiding principle with regard to public safety and natural hazards if the new provisions of the *Conservation Authorities Act* (i.e.

“Part VII Enforcement and Offences”) were proclaimed. At the same time, Conservation Ontario would like to work with the Province to reduce any regulatory burden for responsible businesses and others.

With a positive emphasis on getting more members of the public to enjoy provincial parks, conservation areas and municipal park land, conservation authorities will continue to deliver high quality outdoor experiences, while also maintaining the health and safety of those who attend CA properties. The proclamation of the new Part VII of the *Conservation Authorities Act* as well as an update to the Section 29 regulation will reduce regulatory burden while delivering conservation area programs in a responsible and balanced way.

Further, approximately half of the CAs are delegated responsibilities by municipalities under Part IV of the *Clean Water Act* to provide risk management official (RMO) and risk management inspector (RMI) services to enforce policies that protect sources of municipal drinking water in Ontario. The RMOs implement prohibition policies, and have negotiated several legally-binding risk management plans across Ontario so far, to address certain threat activities in designated drinking water vulnerable areas. In limited instances they issue Orders under the *Clean Water Act* to ensure that threats are addressed. The RMIs conduct inspections, issue Enforcement Orders, and can prosecute persons who commit an offense under Part IV of the *Clean Water Act*.

### **Trust and Transparency**

CAs’ watershed science and monitoring programs provide up-to-date information which is shared with partners, stakeholders and residents through a range of tools and programs, including web-based options. The data CAs collect adds to an improved understanding of watershed conditions and positively contributes to our programs and actions which continue to protect, restore and enhance watershed resiliency. CAs’ monitoring information directly informs our Watershed Report Cards and many of our corporate programs including: plan and permit review, identification of natural hazards, assessment and mitigation of natural hazards, watershed planning, conservation area planning and management, climate change mitigation and adaptation, natural heritage systems planning (including restoration, enhancement and protection), education, stewardship and outreach programs. As well, CAs collect information from source protection plan policy implementers, and report annually on implementation progress of policies that protect municipal drinking water sources.

Many CAs have a network of monitoring instruments which provides them with real-time data regarding water quality and water quantity parameters, as well as ecological monitoring programs. Where these monitoring programs exist, CAs are well-equipped to partner with the Province to collect important natural heritage, water resource and climate change-related data. Conservation Ontario welcomes the opportunity to collaborate with the province and local municipalities to assess the data that is currently collected and identify data gaps to avoid potential duplication of efforts to streamline hydrological and ecological monitoring and reporting programs across Ontario.

### **Resilient Communities and Local Solutions**

CAs provide local science-based expertise enabling the authority to understand and predict watershed conditions and impacts brought about by many social and ecological pressures within our watersheds, including: population growth, rapid land use changes, climate change, invasive species, etc. CA data and floodplain mapping could contribute to provincial initiatives to build resilient communities including real-time monitoring of river data. As well, CAs support updates to source protection science and policies through a locally led multi-stakeholder process that forms the first step to protecting Ontarians’ drinking water. As they are organized on a watershed basis, CAs are uniquely positioned to provide

advice to a wide array of agencies, landowners and businesses on community-specific challenges and concerns. This approach allows CAs to work with municipalities to develop unique, local-level solutions which respect the varying interests and environmental impacts of their partner municipalities.

Overall, Conservation Ontario commends the Province for developing a plan which emphasizes the need for environmental protection and preservation while respecting the need to consider the unique and varied environmental impacts experienced by local communities across the Province. We offer the following general comments on the four action areas of the Plan and more detailed comments on the four action areas are provided in Attachment 1.

### **Protecting our Air, Lakes and Rivers**

Conservation Ontario was pleased to see a commitment to the protection of freshwater resources across the province, including support for the protection of the Great Lakes (with special reference to Areas of Concern and Lake Erie), Lake Simcoe and drinking water sources through the Drinking Water Source Protection program. We note that the quality of the Great Lakes, which are the primary source of drinking water to millions of Ontarians, is significantly influenced by upstream land use changes, land management practices, and climate change impacts which affect the quality/quantity of water from contributing watersheds. It is recommended that the Province best support the protection of water resources through a watershed management approach which recognizes the integrated nature of hydrological and ecological systems across Ontario. CAs have considerable expertise in applying a watershed management approach and can partner with the Province, municipalities, and other stakeholders to effectively support this action. Conservation Ontario welcomes further investment to protect these Lakes as valuable sources of drinking water and economic drivers for the Province and welcomes the opportunity to contribute to updating the Great Lakes Strategy and to report on the significant actions undertaken by the CAs in partnership with the Province and others.

Conservation Ontario is pleased to see the Plan acknowledge the efforts of local source protection committees and CAs who have legislated roles under the *Clean Water Act* to help protect Ontario's municipal drinking water sources. Through the provincially funded Drinking Water Source Protection (DWSP) program, CAs support policy implementation, education and outreach, and updates to source protection science and policies.

CO commends the Province for identifying the action of utilizing the DWSP program work to help address road salt impacts, working with CAs and others to achieve the same. It is equally important to monitor and address impacts of other emerging influences, such as blue-green algae. CO also supports the actions around the review of the Province's water taking policies and programs and the use of DWSP water budget work to ensure sustainable water use and water security for future generations. Work completed through the DWSP program needs to be updated from time to time, to ensure that our water resources are protected and are sustainable through changing factors including growth, development, and climate change. The DWSP program is recognized and envied internationally for its multi-stakeholder, collaborative approach on a watershed basis to ensure that water contamination tragedies and overuse are avoided. It is imperative that the DWSP program continue to be financially supported by the Province, supporting the science and policy work of local committees and CAs, alongside landowners undertaking risk management measures. This will help ensure that our sources of municipal drinking water are safe and abundant.

As well, we are encouraged by the identification of the need to update policies and financing to improve investment in new and innovative technologies and practices for stormwater management. Green

infrastructure and low impact development techniques are an area of expertise in CAs and Conservation Ontario should be included in any related consultations.

### **Addressing Climate Change**

Conservation Ontario commends the Province for integrating climate change considerations throughout the Environment Plan and establishing a commitment to addressing climate change and its impacts across Ontario. The varied impacts of climate change affect Ontario's citizens, businesses, sources of drinking water, air quality and biodiversity. These impacts can in turn affect many natural landscapes which make Ontario a desirable place to live and do business.

Overall, Conservation Ontario is pleased to see a strong emphasis on building resiliency to the impacts of climate change through partnerships and knowledge-sharing, as well as the emphasis on ensuring Ontarians understand the impacts of climate change. Through CAs' natural hazards programs, CA staff work to ensure potential impacts of flooding and erosion hazards are minimized thus ensuring long-term resiliency and protection for communities across the Province. It is recommended that the natural hazards program be further emphasized in this section of the Plan. For example, an important partnership for building resiliency in the Province's critical infrastructure should include an understanding of the role that dams and other flood infrastructure play in extreme weather events and targeting financial investment where it's most needed to protect communities. Finally, Conservation Ontario is encouraged by the Province's commitment to updating policies and building partnerships to improve local climate resilience and should be included in consultations on the Building Code, the review of the Municipal Disaster Relief Assistance program and the review of land use planning policies.

Conservation Ontario is further supportive of the Province improving its ability to consider climate change in decisions impacting policies and programs through the development of a Climate Change Governance Framework. Notably, Conservation Ontario supports the Province in exploring opportunities to enhance coordination and guidance for municipalities to help them consider climate change in their decision-making. Given that CAs work closely with their municipal partners to identify and mitigate potential natural hazard impacts which are often influenced by climate change, it is recommended that the Province further consult with CAs as well as municipalities when exploring guidance opportunities.

CAs are well suited to assist the provincial government and municipalities to address the risks and challenges associated with climate change. As local natural resource management agencies, CAs regularly track and address impacts of climate change to water and land resources through both mitigation and adaptation efforts in collaboration with municipal partners and watershed stakeholders. CAs have significant expertise monitoring, tracking and reporting climate impacts as well as delivering and managing services and programs. As a result CAs are uniquely positioned to provide the Province with local, watershed-scale knowledge on climate change trends, impacts and challenges facing communities across Ontario. It is recommended that the Province collaborate with CAs and leverage the local watershed knowledge and expertise to ensure communities and natural systems remain resilient to the impacts of climate change. Further to the action identified in the "Next Steps" section of the plan, it is recommended that representatives from Conservation Ontario and/or CAs be appointed to the Province's advisory panel on climate change.

### **Reducing Litter and Waste in Our Communities & Keeping Our Land and Soil Clean**

Conservation Ontario supports the wide range of actions the Province has proposed to reduce litter (including plastic waste) in our neighbourhoods, parks and waterways and recommends partnering with CAs to provide programs which encourage environmental stewardship with the public and students

across Ontario. As many CAs currently undertake various clean-up efforts within their conservation areas as well as along shorelines, it is recommended that the Province collaborate with CAs to promote public participation in waste reduction initiatives across Ontario. Further, Conservation Ontario supports the Province's commitment to making it easier and safer to reuse excess soil. CAs regulate fill placement and removal in areas regulated under the *Conservation Authorities Act* and conduct regulatory compliance to ensure that wetlands and hazard lands are not negatively impacted by excess fill placement. As a stakeholder in this regard, Conservation Ontario would request to be engaged through the development of rules to support the reuse of safe soils and increased enforcement on illegal dumping. As well, Conservation Ontario requests further engagement on the 'clean-up of contaminated lands' and improved 'management of hauled sewage'.

### **Conserving Land and Greenspace**

Conservation Ontario appreciates the Province's support for conservation and environmental planning and improving the resiliency of natural ecosystems, and welcomes the intention to work with municipalities and stakeholders to improve the delivery of the mandate of CAs. CAs deliver a broad range of programs and services in fulfilling our mandate under the *Conservation Authorities Act*, many of which support the objectives defined in the Environment Plan. Through their mandate, CAs manage and restore natural features and landscapes to minimize and prevent potential negative downstream effects experienced by communities. Conservation Ontario would highly welcome the opportunity to remain engaged and work collaboratively with the Province and other stakeholders to continuously improve our programs and services, and ensure that an appropriate level of funding and resources is in place to sustain them moving forward.

Further, Conservation Ontario welcomes the Province's commitment to improving coordination of land use planning and environmental approvals by updating ministry guidelines. CAs are committed to providing timely, cost-effective guidance to their municipal partners within planning and approvals processes and would welcome opportunities for improved coordination and consistency through the use of modernized technical guidelines. Conservation Ontario requests to be engaged as the Province develops such guidelines as they pertain to natural hazards considerations under the Provincial Policy Statement (PPS) and as regulated under the *Conservation Authorities Act*.

Finally, CAs manage conservation areas which play a vital role in providing the public with recreational opportunities (e.g. trails) as well as environmental education and awareness. CAs can work with the provincial government in providing opportunities for recreation and world-class experiences and would like to be included in consultations involving the promotion of parks and increasing recreational opportunities.

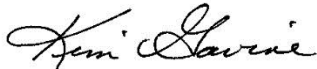
### **Conclusions**

While Conservation Ontario supports many of the overarching goals outlined by the Plan, we are requesting further details on some of the proposed actions, and would recommend that the Province consult further with CAs, other stakeholders and the public on implementation of these actions and any potential accompanying regulations, policies, plans or programs as they are developed. There are many environmental programs outlined in this Plan that are shared among provincial agencies, CAs, municipalities, Indigenous communities and other stakeholders. The residents of Ontario would be best served by the Plan if these roles and responsibilities are fully acknowledged and leveraged in the Made-in-Ontario Plan. In this way, we can collectively ensure that our environment is preserved, protected and restored for future generations.

It is understood from the "Next Steps" section that the Ministry will continue to consult on areas of action and key initiatives identified in the Plan and develop key indicators of progress to measure impact. MECP is encouraged to continue to work with Conservation Ontario, the network of Ontario's CAs, in developing and finalizing additional details of the Environment Plan and through the course of its implementation as key collaborators/partners and delivery agents. The Province is encouraged to leverage the existing expertise, experience and investments of CAs at the local and regional scale to refine key initiatives identified in the Environment Plan and move forward collaboratively to action. Ontario can be a leader in addressing environmental protection and climate change and there are tremendous opportunities for innovations that will address our current, collective environmental and climate challenges.

Thank you for the opportunity to review and provide comments on the proposed Made-in-Ontario Environment Plan. Should you have any questions about this letter or the attached detailed comments on the actions outlined in the Plan, please feel free to contact myself at extension 231 or, for specific clarifications on: Great Lakes and Conserving Land and Greenspace, please contact Bonnie Fox, Policy and Planning Manager (ext 223); Clean Soil or CA role in planning and regulations, please contact Leslie Rich, Policy and Planning Liaison (ext 226); Addressing Climate Change, please contact Jo-Anne Rzakki, Business Development and Partnerships (ext 224); and, Clean Water, please contact Chitra Gowda, Source Water Protection Lead (ext 225).

Sincerely,

A handwritten signature in cursive script that reads "Kim Gavine".

Kim Gavine  
General Manager

c.c. All CA CAOs/GMs

Encl.

## **Attachment 1**

### **Detailed Comments on the Actions outlined in the Made-in-Ontario Environment Plan**

#### Protecting our Air, Lakes and Rivers

##### Clean Air

**Action: Improve air quality in communities by creating unique solutions to their individual challenges.**

CAs work with their communities on solution-oriented initiatives that provide multiple benefits, including improvements to air quality. For example, the Peel Climate Change Partnership's Green Natural Infrastructure project works to increase tree cover in priority areas, including urban areas, in order to reduce public health risk and enhance social and environmental outcomes such as reduced urban heat island effect and better air quality.

##### Clean Water

**Action: Continue to work to restore and protect our Great Lakes**

Conservation Ontario supports in particular the actions around continued commitment to restoring the Great Lakes and providing provincial support for delisting of Areas of Concern (AOCs) and the Lake Erie Action Plan. As well, Conservation Ontario welcomes the opportunity to contribute to updating the Great Lakes Strategy and to report on the significant actions undertaken by the CAs in partnership with the Province and others.

This Action is focused on the lakes, the immediate coastline/nearshore and invasive species and they are supported. Any updates to the Canada-Ontario Agreement (COA) or the Great Lakes Strategy will need to continue to recognize the significant influence local watersheds have on nearshore lake health. A more explicit link between watershed management and nearshore lake health should be established in the proposed Environment Plan recognizing the varying impacts from the quantity and quality of water flowing from the watersheds directly into the Lakes.

Upstream land use changes, land management practices, growth, urban development, and climate change all place stressors on the health of the watershed. CAs monitor and respond to these conditions through resource management activities in an effort to improve the condition of water flowing into the Great Lakes. This Action would benefit with recognition of this fact and should offer programs, including stewardship funding which supports the protection, restoration and enhancement of the Great Lakes' contributing watersheds. A successful, current example is the Healthy Lake Huron collaborative whereby all levels of government pool their limited resources to develop a common understanding of the issues, magnitude of the challenge and what targeted actions are needed to address the issues for the watershed/Great Lakes. The majority of the on-the-ground implementation is undertaken by municipalities and CAs working with local NGOs.

CAs also have a role in regulating Great Lakes shorelines to ensure that development does not occur on or near dynamic beaches or hazardous slopes. It should be acknowledged that CA policies and regulation protect these sensitive landscapes.

CAs are important delivery agents for Great Lakes' Areas of Concern (AOCs) and for the Lake Erie Action plan and we look forward to ongoing support. As stated in the Plan, the provincial funding allocation for the entire Great Lakes Canada Ontario Agreement program is just over 15 million per year. The funding allocation for the Muskoka Watershed Conservation and Management Initiative is \$5 million with

commitments of up to an additional \$5 million from the Province if matching contributions are raised (page 14). Investment in the entire Great Lakes Basin needs to be increased.

The Great Lakes are the primary source of drinking water to millions of Ontarians. The most recent Minister's Annual Drinking Water Report recognizes Ontario's comprehensive DWSP Program which helps protect Great Lakes intakes for municipal residential drinking water systems in Ontario, through protection zones around the intakes and policies that apply within them. The *Clean Water Act* includes a means to establish nutrient targets to reduce the nuisance growth of blue green algae, which aligns with the mandate of other Great Lakes legislation. It is important to leverage the work under the DWSP program to protect our Great Lakes.

**Action: Continue to protect and identify vulnerable waterways and inland waters**

The Environment Plan recognizes that our lakes, waterways and groundwater are the foundation of Ontario's economic prosperity and wellbeing and that effective watershed management is important to Ontarians, especially at times when watersheds are facing stresses such as increased development and climate change impacts such as flooding caused by severe weather events. The stated action to "Continue to protect and identify vulnerable waterways and inland waters" is best supported through a watershed management approach. Through this approach, our activities on the land and shorelines are managed to help mitigate the stresses on our water resources and improve the resilience of watersheds. Ontario's CAs have considerable expertise to offer in achieving this action.

CO supports in particular the action around providing continued support for the implementation of the Lake Simcoe Protection Plan to protect and restore important natural areas and features of the lake. It is suggested that this action should be expanded to be implemented throughout Ontario in order to ensure that we are taking measures to protect our globally valuable freshwater resources (especially given that Ontario has 1/5th of the world's fresh water). The Lake Simcoe Protection Plan is an outstanding example of multiple levels of government, academia, NGOs, and private residents collaborating to protect and restore a watershed. CAs and municipalities can be essential partners in protecting additional vulnerable waterways and inland waters through effective implementation of the provincial planning and water policy framework (e.g., the Growth Plan for the Greater Golden Horseshoe, *Clean Water Act*, Provincial Policy Statement, etc.).

Conservation Ontario is pleased that the Plan acknowledges the efforts of local source protection committees and CAs who help protect Ontario's municipal drinking water sources effectively, per the *Clean Water Act*. The provincially funded Drinking Water Source Protection (DWSP) program is one of MECP's flagship programs and is envied by other countries. The program safeguards drinking water for 85% of Ontarians, and supports watershed health and strong relationships with several First Nations communities. Ontario's DWSP program helps protect over 70 Great Lakes intakes, 60 inland intakes, 13 Lake St. Clair and St. Lawrence River intakes, and 900 groundwater wells that serve municipal residential drinking water systems. In the Plan, there needs to be an equally strong focus on protecting our vulnerable groundwater resources identified under the *Clean Water Act*. Continued improvement to the initial technical work that was completed to prepare source protection plans will also be necessary as more information becomes known about emerging influences that impact our Great Lakes. Protecting sources of municipal drinking water from pollution and depletion is a key part of safeguarding public health and is the backbone of a strong and sustainable local economy. It is crucial that this program continue to be financially supported by the Province, supporting the work of local committees and CAs, alongside landowners undertaking risk management measures.



CO supports the action to build on the DWSP program to help address road salt impacts, working with CAs and others to promote best practices, certifications, and alternatives. Through the DWSP program, salt vulnerable areas are identified around municipal drinking water sources. CAs and CO actively work toward road salt impact mitigation through various projects including best practices guidance, pilot studies, and outreach.

Environmental impacts to water quality are caused by many influences such as nutrients, blue-green algae, sediments, increased development and climate change. It is equally important to monitor and address the impacts of these alongside road salt, as they can affect human health, aquatic habitat, and local economies (through damage to infrastructure and loss of recreational activities). Current water treatment methods are not designed to remove all contaminants. Emerging contaminants such as microplastics and poly-fluoro-alkylated substances (PFAS) should also be monitored throughout the watershed, especially in our drinking water sources. CAs provide a number of programs that monitor, protect and restore our inland waters. Monitoring the quality of our lakes, rivers, and aquifers for various contaminants is necessary to understand the impact of our everyday activities on these dynamic systems. Conservation Ontario welcomes the opportunity to participate in consultations related to the ministry's monitoring and drinking water source activities, and work with the Province and others to address water issues.

The successes of the watershed approach in protecting and enhancing the natural environment are substantial through the work led by CAs. There is a tremendous amount of expertise and partnerships that can be leveraged in a cost effective manner to help the provincial government achieve its goals. The investments made in the CAs' programs over the years have shown positive dividends in terms of preventing or mitigating existing problems.

The Province is encouraged to include in the Plan that they will continue to work with CAs, municipalities, stakeholders and partners to promote best management practices to reduce the impact of activities on our precious water resources. CAs have the data and the presence on the ground to promote this action (i.e. water quality data, mapping, subwatershed information). This information is used to target their resources and management actions to where they can achieve the greatest improvements. For example, in some watersheds, CAs may work with landowners on reducing erosion and water quality impairment through adoption of rural storm water management, cover crops, and restoration of riparian areas. As well, there are rural water quality programs administered by CAs that contribute to the protection of waterways and lakes by working with farmers to undertake environmental projects such as watercourse fencing, tree planting, manure storage and well decommissioning.

**Action: Ensure sustainable water use and water security for future generations**

CO supports in particular the actions around the review of the Province's water taking policies and programs to ensure water resources are managed and adequately protected for future generations, and strongly supports the use of DWSP Program knowledge for other provincial program areas.

The proposed Environment Plan identifies the need to manage water takings to ensure we have sustainable water resources in the face of a changing climate and continued population growth. An important tool to ensuring water security for future generations is to protect our natural features, functions and areas, including groundwater resources. This is referenced in "Conserving Land and Greenspace", and "Addressing Climate Change", and a more holistic approach to securing sustainable water resources in "Protecting our Air, Lakes and Rivers" is recommended. The premise of evaluating

cumulative water takings in the context of overall water management is vital to ensuring that water resources are adequately protected and sustainably used. Therefore, the review of current water taking policies, programs and science tools is supported and Conservation Ontario should be consulted regarding any updates to the Province's water taking policies, programs and tools.

The Province's action of ensuring that the knowledge gained through the DWSP Program is applied to other provincial program areas, is strongly supported. The DWSP program science is a strategic investment by the Province, and can be the driver for innovation in other provincial mandates. Stakeholders have recognized the usefulness of the DWSP water budget models to inform water management decisions being made by the Province in the issuance of Permits-To-Take-Water and Environment Compliance Approvals. The tiered water budget studies identify current and projected future water takings in each watershed or sub-watershed in Ontario to evaluate the vulnerability of municipal drinking water supplies. Where the potential for stress was identified, elaborate drought/low water and climate change scenarios were considered to ensure the sustainability of the water resource over the long-term. This work provides a solid foundation for identifying sustainable approaches to managing our water for the future, including the adoption of water conservation practices and technologies. Work completed through the DWSP program will need to be updated from time to time, to ensure that water takings remain sustainable in the face of climate change. As such, the Province should commit to continuing to support this important program, to ensure that decisions are made based using the best-available science.

The data collected and the knowledge gained through the DWSP program is already being integrated into the work of the CAs and the municipalities. The work provides additional insight to how the watersheds function, including groundwater and surface water interactions. This information is used for watershed management, sub-watershed studies, and site specific development applications.

Effective water management ensures sustainable water use and water security for future generations. Watershed Plans are prime examples of a multi-stakeholder, collaborative process that allows for a comprehensive understanding of water (quantity, quality, uses, etc.) under present and future timeframes. They are the basis for developing management strategies that may include allocation guidelines. It is important that the Province continues to enable these and other forms of collaborative water management. Some CAs have watershed management plans that directly speak to this action.

**Action: Help people conserve water and save money**

CO supports the action of promoting the use of technologies and practices to ensure water resources are used more effectively.

CAs actively promote water conservation efforts through various programs and can support the Province in implementing this Action. In particular, rainwater harvesting is an innovative technology that can help conserve water, save money, and lower the burden on our stormwater infrastructure. This example should be included in the list of technologies and practices provided in the Plan. As well, local outreach and education initiatives are also an important part of a successful water conservation and education program which should be included in the examples.

**Action: Improve municipal wastewater and stormwater management and reporting**

Conservation Ontario supports in particular the actions to update policies and financing to improve investment in stormwater management and to improve municipal wastewater and stormwater

management and reporting, including real-time monitoring and notifications for residents to make informed decisions about recreational activities in waterbodies.

We are encouraged by the identification of the need to update policies and financing to improve investment in new and innovative technologies and practices for stormwater management. With provincial leadership and guidance, significant accomplishments can be achieved throughout Ontario which will further the adoption of Low Impact Development (LID) techniques as a fundamental component in stormwater design and management. LID approaches have been shown to be more effective and less expensive than stormwater management ponds over the long term. Updating and releasing the performance criteria for stormwater management will advance successes in improving stormwater management, design and operations. This will, in effect, improve water quality and aquatic habitat/resources in receiving watercourses and the Great Lakes thus supporting, for example, drinking water and recreational/commercial fisheries. Many source protection plans in Ontario currently either recommend or require the use of LID measures in drinking water vulnerable areas, as these measures within significant groundwater recharge areas effectively support the sustenance of aquifers used for municipal drinking water. It is recommended that CO be consulted on any updates to policies related to municipal wastewater and stormwater management. As well, it is recommended that the Province (i.e. OMAFRA) prioritize the development of standards (and training) for rural stormwater management that would be included as a requirement for receipt of provincial funding in design of Municipal Drains.

Further to examination of financing, Green Infrastructure (including LID) should be included in municipal asset management plans, policies, and strategies. This could be accomplished by including Green Infrastructure in the definition of 'core infrastructure assets' under the Asset Management – Infrastructure for Jobs and Prosperity Act. Targeted investment and innovation in managing stormwater, along with wastewater, will help continue to protect our drinking water.

Real-time monitoring and notifications are welcomed for residents to make informed decisions about recreational activities in waterbodies. However, emphasis and investment should be prioritized to reduce the number of bypasses or overflows that occur, for example, through stormwater management approaches like LID and Green Infrastructure.

It is recognized that not all municipalities have funding capability or existing hydraulic capacity in wastewater treatment plants or capacity in receiving water bodies to assimilate waste to accommodate future growth. The Plan should consider optimization of existing infrastructure, particularly wastewater treatment plants, to stretch existing capacity and improve wastewater effluent as part of infrastructure planning. This approach has been quite successful in several municipalities within Ontario; the costs of upgrades to wastewater treatment plants have been avoided and/or delayed significantly, while the effluent quality has improved.

## Addressing Climate Change

### Building Resilience: Helping Families and Communities Prepare

#### **Action: Improve our understanding of how climate change will impact Ontario**

While Conservation Ontario supports the commitment to undertake a provincial climate change impact assessment, it would be helpful to understand what balance the provincial assessment will attempt to achieve between a high-level, broad scale approach and a regional scale assessment that considers spatial detail and local/regional interdependencies (e.g. flood management system and the telecom sector). Further clarity is requested on how a provincial-level climate change impact assessment will

inform local or regional decision-making as many of the impacts and solutions will vary based on local and regional specificities.

Conservation Ontario supports the need for vulnerability and risk assessments. Many CAs and municipalities have begun work or have completed local vulnerability and risk assessments. There are CAs with municipalities in their jurisdictions which are experiencing various growth and population pressures which can in turn influence the rate and intensity which climate change impacts may affect a community. CAs utilize their watershed-based view to conduct work with these communities which contributes to vulnerability and risk assessments such as: monitoring water quality and quantity, updating floodplain mapping to inform the delivery of flood forecast and warning during flood events, and partnering with specific sectors, such as agricultural producers and organizations to help farmers meet a range of agricultural environmental challenges while ensuring food security in Ontario. Through this work, CAs collect and analyze climate and other environmental data, such as hydrologic modeling, dual drainage modeling and stream erosion assessments, which inform local strategies to address climate change. It is recommended that the Province work with municipalities and CAs to consolidate and review the existing work which reflects the specific needs of Ontario's communities and conduct a gap analysis to identify regions within the Province which have yet to begin work on developing these assessments.

It is further recommended that in addition to the assessments proposed for the transportation, agriculture, energy and water sectors, impact and vulnerability assessments for the natural environment, including biodiversity and groundwater resources be conducted. CAs can offer valuable information and insight in this regard and would welcome the opportunity to discuss partnership with the Province to undertake regional impact assessments on a watershed scale.

Collaboration by all levels of government will help develop a common understanding of the impacts and solutions that are needed across Ontario. There are many sources of climate change impact information in Canada, and that the province is encouraged to consider. They are available to the public and to decision makers through the recently established Canadian Centre for Climate Services, which aims to provide access to climate information, build local capacity, and provide training and support. Similarly, the Federation of Canadian Municipalities maintains a network of climate advisors like Ontario Centre for Climate Impacts and Adaptation Resources and the Ontario Climate Consortium (OCC) who assist municipalities in accessing and interpreting climate change data and provide training to member municipalities. As such, any work done to improve understanding of the impacts of climate change should be undertaken in a way that avoids duplication and finds efficiencies.

Conservation authorities and municipalities have been at the frontlines when it comes to understanding impacts of climate change on flooding and erosion and helping communities reduce their risk and prepare. With resources, CAs are and will update flood plain maps and are working to understand flooding impacts from both riverine and overland flow. This includes flood risk assessments and vulnerability mapping (that goes beyond the physical land assessments, to encompassing social, emergency services and other socio-economic layers) that informs the delivery of flood forecast and warning during flood events. Flood mapping and other technologies like realtime river monitoring and phone apps help CAs and emergency management officials predict where the most impacts are which ensures people, businesses and institutions at most risk during an event can be warned and evacuated safely.

The information we collect and manage also helps assessing levels of service, management of our flood infrastructure, planning communities that keep people out of flood and erosion vulnerable areas, and, development of standards and tools for return on investment solutions. CA floodplain mapping (where available) and data could be utilized in the proposed provincial impact assessment to identify where and how climate change will impact communities. As part of this assessment, we recommend that impacts to dams, dykes and other flood infrastructure be considered.

Furthermore an update to technical guidance to protect people and property from flooding and water-related hazard which is proposed as an action elsewhere in this plan is supported. Climate change considerations should be incorporated in the update to the technical guidance and funding will be required to undertake new floodplain mapping as the source data for the impact and vulnerability assessments. With continued resources Conservation Ontario and CAs can assist the Province in developing clearer understanding of flooding related climate change risks and solutions.

As mentioned elsewhere, the DWSP water budget studies have vastly improved our understanding of the impacts of climate change on our water supplies as well. Recently, Conservation Ontario worked with the MECP and CAs to develop a comprehensive guidance document and assessment tool to determine climate change impacts on drinking water source quality. This tool can be utilized at a watershed, sub-watershed or smaller scale (as needed locally), and complements the well-established water budget methodology. The Province is encouraged to finalize the new tool for use by local committees and CAs, to improve our understanding of how climate change impacts Ontarians' drinking water source quality.

Conservation Ontario also encourages the Province to consider that where climate change vulnerabilities and risks are already well known, support for adaptation actions should be applied in high priority areas regardless of province-wide impact assessment processes occurring in the coming years.

**Action: Help Ontarians understand the impacts of climate change**

As watershed management agencies with established environmental education programs, CAs are in a position to assist the Province in providing relevant information to help stakeholders better understand the impacts of climate change in their communities. Many municipalities and CAs have already implemented initiatives and developed local expertise regarding local climate change impacts. For example, CAs hold a wealth of knowledge in understanding and communicating the various types of flood risk and potential impacts to property and the impacts of water takings and drought on municipal drinking water sources. As well, CAs have longstanding relationships with a variety of stakeholder groups across the province, including farmers and rural communities, and request that the Province partner with CAs to effectively administer education and outreach programs to these groups. CAs would welcome working with the Province to communicate the local impacts of climate change.

Conservation Ontario and CAs currently engage with stakeholders such as the insurance and real estate industries to ensure that relevant stakeholders understand various types of flooding as the Province experiences more frequent extreme weather events. It is recommended that the Province collaborate and leverage the efforts of CAs to further educate the public on different types of flooding and what is effective in reducing flood risk.

Credit Valley Conservation with Risk Sciences International has developed a Risk and Return on Investment Tool which exists to provide support to municipalities when making infrastructure investment decisions in light of climate change. It is an example of one tool which could be considered

for application across Ontario. As well, once finalized, the new DWSP climate change tool will help Ontarians understand how their drinking water sources may be impacted by climate change, and what they can do to help.

**Action: Update government policies and build partnerships to improve local climate resilience**

Conservation Ontario supports the actions that are identified in this section including modernizing the building code, review of disaster recovery assistance programs, updating planning policies to support climate resilience, and supporting resiliency of agriculture and food sectors. Detailed comments are provided on these actions below. As well, with regard to updating government policies and building partnerships to improve local climate resilience, there are a number of additional opportunities identified for inclusion. Overall, as the Province moves forward with updating government policies to update direction on climate resilience, Conservation Ontario and CAs would highly welcome the opportunity to be engaged.

Conservation Ontario requests that CAs be included in any consultation for modernizing the Building Code to better equip homes and buildings to withstand extreme weather events particularly flooding and erosion hazards. The Plan speaks to the possible development of adaptation measures to significantly reduce impacts of flooding hazards. CAs hold significant expertise for mitigation of these impacts through their legislative responsibility to protect human health and safety from natural hazards which may impact property and other municipal infrastructure. Technical guidelines for appropriate flood proofing of existing building and structures need to be modernized to assist Conservation Authority and municipal decision makers in assessing redevelopment/replacement proposals in existing floodplains to ensure that not only basements, but the structural integrity of buildings and structures is addressed. This applies to both riverine and Great Lakes coastal flooding, erosion and ice hazards.

The Province can play a leading role by assessing performance of historical disaster recovery activities as proposed. The review of the Municipal Disaster Relief Assistance Program to incorporate climate resilience improvements when repairing or replacing damaged infrastructure is encouraged as this is extremely valuable for reducing future flood risk and overall infrastructure costs to municipalities.

Conservation Ontario supports the province's commitment to 'review land use planning policies and laws to update policy direction on climate resilience'. Many CAs are currently working with their local municipalities on integrating climate change considerations within municipal and CA policies and plans. Some local source protection plans include policies to help address climate change. To assist municipalities and land use planning authorities, development of provincial guidance documents on interpreting and addressing climate change in land use planning applications would be appreciated. In the past, the Province has provided similar documents to assist in considering climate change in environmental assessments. Documents such as these would assist municipalities and land use planning authorities on incorporating effective climate change considerations into planning applications through a provincially-coordinated approach.

Ongoing support from the province for programs and partnerships that make the agriculture and food sector more resilient is appreciated. As noted elsewhere, CAs are well-positioned to work with the provincial government and other stakeholders to deliver on-farm soil and water quality programming through our stewardship programs which are well established within local communities. CAs administer municipal rural water quality programs under the guidance of agricultural stakeholder committees and leverage resources from government and other partners to deliver results. Conservation Ontario and

CAs are also participating at various agricultural tables including the 4R Nutrients Table, Certified Crop Advisors, and, local Ontario Soil and Crop Improvement Association Chapters.

There are two government policy and partnership opportunities that are not addressed in this section, which could result in significant improvements to local climate resilience. These include: i) the natural hazards program, and, ii) natural areas.

- i) CAs administer Ontario Regulations under the *Conservation Authorities Act* to address public health and safety risks as they relate to natural hazards. Extreme weather events can increase flood and erosion risks to existing communities. It is important that the provincial government continue to work with CAs and municipalities to ensure that floodplain and natural hazard mapping is updated based on new technologies in modelling and mapping to ensure that flood vulnerable areas are identified, emergency plans put in place, and new development is located outside of natural hazards, including floodplains. The Plan, in this climate change section, should emphasize the continued importance of reducing the risk to public safety and directing development outside of the floodplain and the need for updated provincial technical guidance should be reinforced as well.

As well, building resiliency in the Province's critical infrastructure should include an understanding of the role that dams and other flood infrastructure play in extreme weather events and targeting financial investment where it's most needed to protect communities. CAs own and manage over 900 flood control structures along rivers and shorelines in Ontario that protect more than 46,000 homes, preventing well over \$100 million a year in damages.

- ii) While the 'Conserving Land and Greenspace' section of the Environment Plan acknowledges the importance of natural areas with respect to climate change adaptation, it is not identified within the Climate Change section of the Plan. It is recommended that a strong recognition of the importance of our natural systems in improving community resilience to climate change be included in the climate change section of the Plan. Healthy natural areas, including wetlands, watercourses and riparian areas possess greater capacity to adapt to climate change impacts. The addition of an Action which recognizes the importance of improving partnerships and developing policy supportive of protecting, restoring, and enhancing natural areas as an effective approach to lessening the impacts of climate change is recommended.

Related to the above point, Conservation Ontario with other key stakeholders recently supported the importance of including natural infrastructure in municipal asset management recognizing the climate and flood resilience role as well as other benefits of this infrastructure.

#### Continuing to do Our Share: Achieving the Paris Agreement Target

Conservation Ontario commends the Province on its commitment to achieving the Paris Agreement target through reducing emissions by 30 percent below 2005 levels by 2030. The progress in Ontario should be celebrated and built upon in order to maximize the overall reduction in emissions during this period. Conservation Ontario further recommends that the Province include acknowledgement for the benefits provided by wetlands, woodlots and soils as natural carbon sinks. The continued protection of these features provides important benefits to addressing climate change and should be recognized with the Plan as significant contributors to the reduction of emissions across the province.

Finally, Conservation Ontario commends the Province for committing to transparency through updates and progress reporting. We look forward to the finalization of details that include reporting timelines to ensure Ontario is making progress towards the 2030 targets.

### Make Polluters Accountable

#### **Action: Implement emission performance standards for large emitters**

The Plan references the possible adoption of offset credits and/or payment in lieu of compliance. It is recommended that opportunities to protect, restore and enhance natural areas be considered as a means of implementing these offset credits or payments. CAs have significant expertise in restoration and enhancement of Ontario's natural areas and would welcome partnering with the Province to utilize these credits to maintain and restore areas such as wetlands and forests which provide significant benefit to carbon capture and the overall reduction of emissions. Conservation Ontario would welcome involvement in future consultations in this regard.

### Activate the Private Sector

#### **Action: Launch an emissions reduction fund – The Ontario Carbon Trust – and a reverse auction to encourage private investment in clean technology solutions**

Conservation Ontario is supportive of an Ontario Carbon Trust. The Trust is proposed to focus on re-investing in commercially viable opportunities. Conservation Ontario recommends that a portion of revenue generated through the Trust be dedicated to improving the resilience of natural areas as an effective and long term climate change adaptation tool.

It is recommended that management of the Trust be transparent to ensure effective use of funds and should include a means of tracking how the investments and activities result in reduction of GHG emissions in Ontario.

#### **Action: Encourage private investments in clean technologies and green infrastructure**

Conservation Ontario supports the Province's commitment to encourage private investments in clean technologies and green infrastructure. It is recommended that the Province look to support and incentivize existing programs that encourage private investment in green infrastructure, including partnership approaches that meet multiple objectives using an integrated approach to water resources management. Conservation Ontario further recommends that a greater portion of the revenue generated by Green Bonds be used to directly improve the resiliency of natural areas.

Maitland Valley CA has established the carbon footprint initiative to help the private sector understand the impacts of climate change, how to mitigate and adapt to it. Climate change is affecting the viability of their businesses as well, especially in the insurance, agriculture, forestry, outdoor recreation sectors. They are willing to contribute funding towards the solution and the CA is willing to work with their peers in their respective sectors to encourage others to take action as well.

### Use Energy and Resources Wisely

#### **Action: Conserve energy in homes and buildings to cut costs and reduce emissions**

Conservation Ontario applauds the Province for its focus on energy efficiency as a key action area to address the impacts of climate change. Many CAs are leaders in this area through the development and implementation of energy efficient strategies for vehicles, equipment and facilities. CAs have partnered with local organizations and municipalities for facility upgrades and new facility projects which meet a range of Leadership in Energy and Environmental Design (LEED) certification standards.



Conservation Ontario encourages the Province to develop a transparent system for tracking and reporting the return on investment and responsible use of public resources to drive private sector investment in use of new energy technologies. We further encourage the Province to develop tools that assist households with evaluating the return on investment for families who implement energy-saving measures.

#### Doing Our Part: Government Leadership

##### **Action: Make climate change a cross-government priority**

Conservation Ontario is supportive of the Province improving its ability to consider climate change in decisions impacting policies and programs through the development of a Climate Change Governance Framework. Conservation Ontario encourages the Province to include CAs, municipalities, and other broader public sector organizations in cross-government coordination efforts to leverage local and regional expertise for effective decision-making. Notably, Conservation Ontario supports the Province in exploring opportunities to enhance coordination and guidance for municipalities to help them consider climate change in their decision-making. Many CAs partner with municipalities to develop and implement programs within communities which attempt to mitigate and adapt to potential threats influenced by climate change. As a commenting body, CAs use their knowledge of the local watershed to provide comments and proposed alternative solutions which may minimize impacts of climate change on planning and development applications. As many CAs work closely with their municipal partners to identify and mitigate potential natural hazard impacts which are often influenced by climate change, it is recommended that the Province further consult with CAs as well as municipalities when exploring guidance opportunities.

##### **Action: Empower effective local leadership on climate change**

Conservation Ontario supports the Province's commitment to empower effective local leadership on climate change. Through their role as watershed agencies, CAs have an important part to play in maintaining functioning ecosystems at the watershed level, and can utilize their knowledge of their watersheds to assist the Province and local municipalities by reviewing climate change related issues at this scale. Many CAs currently work in partnership with municipalities and environmental agencies on stakeholder mobilization initiatives related to climate change, as well as contribute to collective knowledge sharing to inform stakeholders and develop local best-practices.

Conservation Ontario encourages the Province to utilize the knowledge and leadership currently displayed by CAs to act as effective local leaders on climate change resiliency in their communities. It is further recommended that the Province acknowledge that many municipalities have already undertaken significant actions to mitigate and adapt to climate change and have partnered with CAs for their expertise in coordinating, participating, or leading climate change strategies. Conservation Ontario recommends that the Province leverage the experience and key lessons learned from these partnerships to share best practices with community groups and business associations. If so desired, the Province could formalize the role through a provincially-mandated program and service regulation for climate change. Section 40 (2) of the *Conservation Authorities Act* is not yet proclaimed but it provides an opportunity for the Province to establish standards and requirements for Conservation Authorities to mitigate the impacts of climate change and provide for adaptation to a changing climate, including through increasing resiliency.

##### **Action: Support green infrastructure projects**

Through maintaining natural features which deliver a wide range of infrastructure functions, CAs play a key role in supporting and implementing green infrastructure projects. The natural capital which is generated by the significant ecological functions of these features helps to achieve multiple benefits for communities, including reducing pollution, managing stormwater, and providing recreational services for families. In this regard, CAs are well positioned to assist the Province, municipalities, landowners and businesses in developing, investing in and implementing green infrastructure.

There are many examples of where CAs currently integrate climate change considerations into infrastructure projects to ensure the continued durability and resilience of structures. For example, TRCA has supported member municipalities in integrating greenspace and green infrastructure into communities through initiatives such as retrofitting existing stormwater management ponds, terrestrial natural heritage system design, urban forest management and facilitating Low Impact Development. Further, CAs provide integrated planning processes which bring a multi-objective lens to the design of green infrastructure systems, which is necessary to optimize designs to have the greatest impact. These multi-objective projects offer the opportunity to leverage planned infrastructure renewal to achieve cost-sharing opportunities for municipalities. CAs are often well positioned with completed plans and established partnerships available to advance implementation of these projects quickly. As well, as previously mentioned, many source protection plans utilize green infrastructure in the form of Low Impact Development solutions within drinking water vulnerable areas. It is recommended that the Province, in addition to supporting and promoting the investment and use of green infrastructure broadly throughout our communities, should also consider the value of this type of infrastructure in reducing those costs associated with the use, maintenance and replacement of existing municipal stormwater facilities/infrastructure.

## Reducing Litter and Waste in Our Communities and Keeping Our Land and Soil Clean

### Reduce Litter and Waste

#### **Action: Reduce litter in our neighbourhoods and parks**

CAs support this action to reduce litter (including plastic waste) in our parks and conservation areas. CAs are significant landowners of natural areas in Ontario and request to be identified as important partners in implementation of this Action.

Further, it is recommended that the Province collaborate with CAs as partners in supporting engagement and education through cleanup efforts. CAs regularly engage with the public in a variety of education, training and outreach initiatives such as shoreline cleanup events to raise awareness of the impacts of waste and pollution in our parks, waterways and coastal areas.

### Clean Soil

#### **Action: Increase the redevelopment and clean-up of contaminated lands in Ontario to put land back into good use**

The brownfields regulation is a vital part of the clean-up of contaminated land and the re-establishment of productive use of the land. It helps to protect existing and future owners and users of that land from exposure to potentially toxic substances, and protects the natural environment and water sources from contamination. Any amendments to the regulation should maintain these protections.

The clean-up of contaminated lands in Ontario is welcomed and CO would like to be further engaged as the Province sets out to revise the brownfields regulation and record of site condition guide to ensure

that proper protections are in place to facilitate brownfield redevelopment while protecting the public and the environment. We note that the record of site condition guide has been instrumental in defining what constitutes “clean fill” and that this update will be important in support of the province’s efforts to make it easier to reuse excess soil.

**Action: Make it easier and safer to reuse excess soil**

Managing excess soil in the province requires a collaborative effort by the province, municipalities, CAs, landowners and others to ensure that it is treated as a resource that can be reused.

CAs regulate fill placement and removal in areas regulated under the CA Act. In addition to processing permits for large fill applications in regulated areas, CAs also conduct regulatory compliance to ensure that wetlands and other hazard lands are not negatively impacted by excess fill placement.

Illegal dumping of excess soil is a substantial problem in a number of areas in Ontario. The soil is often placed in areas where it alters drainage patterns, encroaches on wetlands and valley lands, and may cause flooding and contamination of drinking water sources. Enforcement is costly. Assistance from the province to increase enforcement of this practice is welcomed, especially with the province’s expertise with regard to soil quality. Given the stated outcome that CAs, in cooperation with others, “increase enforcement on illegal dumping of excess soil”, it is recommended that Part VII Enforcement and Offences of the *Conservation Authorities Act* be proclaimed to support implementation of this Action.

The Province’s intention to set clear rules to support the reuse of safe soils and work with stakeholders to increase enforcement on illegal dumping of excess soil is supported and CO would like to continue to be engaged in this process. Industry can often reduce construction costs and limit soil being sent to landfill by effectively managing the soil on site. To this end, the TRCA has developed a number of guidelines to protect soils, including “Preserving and Restoring Healthy Soil: Best Practices for Urban Construction” (2012).

**Action: Improve management of hauled sewage**

CO supports the consideration of approaches for the management and spreading of hauled sewage and protecting water resources is an important consideration. Examining options for addressing environmental impacts and human health concerns associated with hauled sewage management, including its treatment, disposal and beneficial uses is important. There is still much to understand with respect to how these materials could impact the environment and a more comprehensive understanding of their behaviour and management is warranted. Conservation Ontario welcomes consultation in this regard.

## Conserving Land and Greenspace

**Action: Improve the resilience of natural ecosystems**

CAs are one of the largest landowners in Ontario, owning a total area of 150,209 ha. CAs successfully partner with municipalities and environmental organizations, such as Ducks Unlimited Canada and Nature Conservancy of Canada, in securing environmentally significant lands to effectively protect and enhance natural resources. Current land securement is often guided by a CA Land Acquisition Strategy which identifies the protection of additional lands of high natural heritage value in an effort to maintain and improve community and watershed health. Conservation Ontario is pleased to see the approach of partnering with NGOs reflected in this plan as provincial funding support is important for leveraging

additional support from other sources. Continued support of CAs and other organizations in the long term protection, management and securement of natural areas is needed.

CAs have vital knowledge and experience in managing their watersheds including monitoring, assessing and managing impacts from watershed stressors like invasive species, climate change and population growth. The Province is encouraged to identify specific targets or thresholds for protecting and restoring natural ecosystems, to enhance the ability for municipalities and CAs to implement actions to meet ecological targets. This work informs CA programs, projects and actions that support and improve the resilience of our watersheds and these projects and actions are implemented with landowners, communities and businesses. Recognition of the important contribution of CAs in this regard is recommended as they are leaders in land and water conservation and in improving the resilience of natural ecosystems.

Also with regard to the first bullet, forest health needs to be added to the list of natural ecosystems as they relate to ecological functions. Their health and continual protection, especially in light of climate change, needs to be of focus. The 'sustainable forest management' action area later in this section of the Plan primarily addresses forests from a resource/economic perspective.

Conservation Ontario strongly supports the sub-action item "...and update technical guidance to protect people and property from flooding and water-related hazards (page 47). This provincial technical guidance has not been updated since 2002 and does not reflect current science, land use patterns and the changing climate. In this regard, conservation authorities have staff expertise and experience to actively assist from both policy and technical perspectives and request that they be party to the update. For greater efficiency and certainty for proponents, in addition to supporting land use planning decisions under the Provincial Policy Statement, the updated technical guidance should also serve as technical guidance for permit decisions under the *Conservation Authorities Act*. The importance of sufficient natural cover in the watershed to minimize the potentially devastating impacts of flooding and erosion is an important component to improving the resilience of the natural ecosystem.

**Action: Support conservation and environmental planning**

The Province's support for conservation and environmental planning and the Province's intention to work with municipalities and stakeholders to improve the delivery of the mandate of CAs is appreciated. CAs deliver a broad range of programs and services in fulfilling our mandate under the *Conservation Authorities Act*, which contribute to many of the objectives and actions identified in the Plan. We would highly welcome the opportunity to remain engaged and work collaboratively with the Province and other stakeholders to continuously improve our programs and services, and ensure that an appropriate level of funding and resources is in place to sustain them moving forward.

As noted in this section of the Plan, CAs assist in protecting people and property from flooding and other natural hazards as well as conserving natural resources. This is partially achieved through plan review, permitting and compliance. Further, CAs also manage flood infrastructure, protect environmentally significant areas, offer recreational opportunities and promote environmental stewardship in urban and rural areas across Ontario.

In addition to working with municipalities to ensure that CAs focus on protecting people and property from flooding and other natural hazards and conserving natural resources, the context for doing so should be noted; i.e. collaborative watershed planning. Collaborative watershed planning provides a means for CAs, municipalities and other stakeholders to assess the opportunities for and the value of

individual and collective actions. The value of the watershed management approach is acknowledged elsewhere in the Environment Plan with regard to the Lake Simcoe Protection Plan and the Muskoka Watershed Conservation and Management Initiative. As elaborated upon earlier, CAs have legislated roles, alongside others, under the *Clean Water Act* for protecting drinking water sources as well. Local source protection plans under the *Clean Water Act* are also applied on a watershed basis, serving conservation and environmental planning goals.

Conservation Ontario would like to be engaged as the Province looks to modernize Ontario's environmental assessment process as the proponent of the parent Class EA document for Remedial Flood and Erosion Control Projects which is currently being streamlined and given that CAs review environmental assessments that are proposed in their watersheds.

CO supports the provincial commitment to protect vulnerable or sensitive natural areas such as wetlands through the identified tools. An additional existing tool to be acknowledged for protecting wetlands is strong regulation to ensure these features are not lost on the landscape.

Improved coordination of land use planning and environmental approvals processes by updating ministry guidelines is strongly supported. For example, improved coordination and consistency in dealing with natural hazards regulated through Ontario Regulations, as provided for in the *Conservation Authorities Act*, could be achieved with a set of modernized and updated technical guidelines which provide guidance for the administration of the Ontario Regulations and Conservation authority decision makers. Conservation Ontario welcomes the opportunity to be engaged in the associated consultation process for this example and others that might be under consideration. CAs continue to be committed to streamlining planning and approvals processes and to providing the best guidance to their municipal partners in a timely and cost-effective manner. CAs are prepared to assist the Province with identifying those streamlining opportunities and recommend a multi-sector consultation to achieve the best outcomes.

CO strongly supports the Ontario government commitment to "protecting the Greenbelt for future generations" and the recognition of its important role in ecosystem resilience (p.48).

**Action: Promote parks and increase recreational opportunities**

This is an important economic engine in Ontario and Conservation Ontario supports in particular the actions around supporting the creation of new trails, looking for opportunities to expand access to parks throughout the province, promoting the link between nature and human health by supporting Healthy Parks Healthy People, and partnering with CAs.

With regard to 'Support the creation of new trails across the province' it should be added 'while ensuring the protection of significant and sensitive features'. CAs have extensive experience in expanding trail systems in this regard both on their lands and across their watersheds partnering with government agencies, municipalities and NGOs. There are 2,600 km of trails in CA conservation areas.

In southern Ontario, where the bulk of Ontarians are located, quality recreational space is provided in large part by CAs. Conservation areas offer a unique urban/suburban outdoor experience due to their proximity to highly populated areas that are not offered by other parks. Expansion of access to near urban parks which are accessible to the majority of Ontarians, within a short drive is very important. The number of visitors to conservation areas continues to grow significantly and this places stresses on the ecological value of our land holdings and on the infrastructure and management of these areas.

Recognition that protecting these areas is a shared responsibility is important. CAs can work with the provincial government in providing opportunities for recreation and world-class experiences and would like to be included in consultations.

CAs manage conservation areas which play a vital role in providing the public with recreational opportunities as well as environmental education and awareness. Conservation Ontario has been running a very successful Healthy Hikes campaign for CA conservation areas and would be pleased to share our experience with the Ontario Parks Healthy Parks Healthy People approach.

It should be acknowledged that the increased use and promotion of protected spaces needs to be balanced with maintaining ecological health and minimizing impacts from use (e.g., invasive species, user damage from compaction, harvesting and erosion). Tools and programs that support responsible management and continued protection of our ecologically significant lands are needed. Acknowledgement of the shared responsibility for conserving Ontario's protected lands and continuation of partnering with CAs and others is appreciated.

**Action: Sustainable Forest Management**

Conservation Ontario is supportive of this action as CAs own and sustainably manage large tracts of wooded areas within Ontario. It is noted that the actions identified are specifically focused on greenhouse gas emission and carbon storage. Forests have an important role in climate change resilience that goes far beyond measuring greenhouse gas emissions and carbon storage. The value of forest management in addressing the importance of forests in protecting water resources, habitat, and biodiversity should be acknowledged/supported in the Plan.

**Action: Protect species at risk and respond to invasive species**

CO supports the action of working with partners and other governments to protect species at risk and to prevent the spread of invasive species in Ontario.

It is important that the Province continue to protect species at risk and to support ongoing management and awareness of invasive species. CAs provide support to the protection of species at risk and management of invasive species in a variety of ways, including early detection of invasive species and through providing local expertise and liaison services which support the species at risk program in Ontario. It is recommended that the Province leverage the local knowledge and expertise of CAs when developing tools to protect species at risk and to respond to invasive species threats across Ontario.