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Re: Conserving our Future: Proposed Priorities for Renewal (EBR 012-7583)

The Green Infrastructure Ontario (GIO) Coalition is pleased to have the opportunity to review the ‘Conserving Our Future: Proposed Priorities for Renewal’ document and provide comments on this second phase of the *Conservation Authorities Act* review.

Conservation Authorities (CAs) protect and manage Ontario’s natural resources and support Ontario’s environmental priorities. This important role makes them a key stakeholder in growing Ontario’s green infrastructure network.

Green infrastructure is a proven tool that utilizes natural and human-made elements that provide ecological and hydrological functions and processes to deliver environmental, economic and social benefits. It includes natural capital, semi-natural areas, and technologies; in brief, everything from tree-lined streets, urban parks and gardens, to conservation areas, agriculture, and bioswales. One of the key rationales for green infrastructure is its ability to perform several functions in the same area. In contrast, most grey infrastructure (eg. roads, pipes) has only a single purpose and benefit. Green infrastructure investments provide a cost-effective complement (or alternative) to grey infrastructure and as they become more common across the province, the expertise of CAs will be increasingly necessary to manage these systems for maximum benefit.

To solicit input on the priorities outlined in ‘Conserving Our Future: Proposed Priorities for Renewal’, the province posed questions regarding the priorities, recommended actions to achieve these priorities and challenges to making improvements. We have addressed each priority in turn, speaking to the broad themes outlined in the questions for each.

Priority 1 – Strengthening oversight and accountability in decision making

The GIO Coalition supports this priority as it relates to modernizing provisions around board operations and decision making. As the discussion paper outlines, many CAs have aligned their operations with recognized best management practices for board operations including the development of strategic plans and aligning conflict of interest provisions. We support the goal of formalizing these practices across all conservation authorities and ensuring conservation authority programs and services are governed in a fair and transparent manner.

The GIO Coalition would like to provide some feedback on the proposal to add a purpose statement to the act and regulations. While there is a need to clarify the mandate and role of CAs, we suggest that any purpose statement developed focus on increasing clarity and consistency (i.e. priority #2) and would be best included within the policy directives instead of through changes to the Act. A purpose statement for CAs should speak to the primary roles of CAs but should also remain broad enough to allow them to conduct activities that can change, evolve and intensify in response to ever-changing natural resource management needs and challenges.

Adaptability and independence are important features of CAs, especially in the context of climate change, and the policy framework should support this. A broadly defined purpose would also continue to allow for local solutions and approaches. CAs are local watershed agencies that serve the local community within that watershed. CAs have unique watersheds with a range of environmental features and urbanization levels that require context specific management. To provide equitable and effective management, CAs should have a baseline standard set of responsibilities combined with the flexibility to adapt to changing contexts and issues. We would encourage the province to include low impact development and other green infrastructure practices in a standard set of responsibilities, but the exact scope of work and programs would be best determined through a CA's strategic plan and other guiding documents. This is where they can best help ensure that programs meet local watershed and community goals and objectives.

Priority 2 – Increasing Clarity and Consistency

The GIO coalition supports this priority which aims to increase clarity and consistency in roles and responsibilities and we are pleased that the intent is not to remove the flexibility given to conservation authorities to develop local, or regional-scale, programs and services designed to further the conservation, restoration, development and management of natural resources. In order to support enhanced clarity and consistency, it is crucial that mandated provincial programs be accompanied with adequate and sustainable provincial funding in order to enable CAs to deliver them.

Priority 3 – Improving Collaboration and Engagement

The GIO coalition strongly supports adopting a multi-ministry approach to capture the full extent of programs delivered by CAs to address provincial priorities. No single ministry captures the breadth of contemporary CA

programs and effective delivery of CA work requires direct interactions with a number of different ministries. We do not encourage a provincial one-window approach to establishing, coordinating and reviewing CA programs and services. We would strongly encourage the province to pursue administration of the *Conservation Authorities Act* through an inter-agency collaboration. This would be a prime opportunity to leverage important multi-ministry interactions that already exist and maximize opportunities to recognize and grow CA partnership contributions to the work of the provincial government. Conservation Ontario, with accompanying funding, could provide the coordination for this inter-agency body.

The leadership role CAs have played - and must continue to play - in developing and implementing green infrastructure practices exemplifies why a cross-ministry approach is needed for CAs. Green infrastructure is emerging as a priority for multiple provincial ministries, but CAs have been the first to cut across the silos within provincial policy and between municipal governments to advance green infrastructure. By advancing green infrastructure in this way, CAs have facilitated the policy goals of multiple provincial ministries and enhanced collaboration and engagement with municipalities.

Priority 4 - Modernize funding mechanisms to support conservation authority operations.

The reality of climate change makes CA programs and activities increasingly integral to environmental management of the province's water and natural resources. CAs are well positioned to help municipalities and the province manage the impacts of climate change, including adoption of green infrastructure as a mitigation and adaptation asset for municipalities. Accordingly, CAs require appropriate resources and mandate to fulfill this role.

The current funding model does not recognize the resources required to sustain a broad suite of CA programs that support communities and help realize provincial objectives and priorities. In particular, CAs are a key green infrastructure implementation agent. There are many evolving provincial policies and programs that directly reference the need for green infrastructure across the province. The 2014 Provincial Policy Statement, the proposed Growth Plan for the Greater Golden Horseshoe and Greenbelt Plan, the Great Lakes Protection Act, the Climate Change Strategy, the draft MOECC Low Impact Development Guidelines, and the Ontario Ministry of Infrastructure's 10-year Infrastructure Plan all reference green infrastructure as a practice that should be adopted. CAs are best positioned to help municipalities and the Province do this. Provincial funding formulae need to be developed to recognize and support the role of CAs in ensuring implementation of provincial policy goals for water quality and quantity, including climate mitigation and adaptation, intensification and growth, great lakes water quality objectives, and more.

Priority #5 - Enhancing Flexibility for the Province.

The GIO coalition is supportive of the development of additional natural resource conservation and management programs. As discussed above, flexibility of scale and adaptability to regional requirements are among the benefits of CAs, which are well-positioned to enhance provincial flexibility with respect to priorities

and implementation. However, it must be noted that the delegation of additional existing or new programs and services should be accompanied by additional sustainable funding from the Province.

To enhance flexibility, many of the priorities outlined in 'Conserving Our Future: Proposed Priorities for Renewal' would best be address not through changes to the Act, but through the development of other guiding documents. The province should be commended on its stakeholder engagement throughout this process, and should continue to meaningfully engage stakeholders in the development of guiding documents and policy directives.

Green Infrastructure Ontario Coalition Background

Over the last seven years the GIO Coalition has been successfully promoting the implementation of living green infrastructure across Ontario. With over 140,000 people working full time in the industry, from nurseries to designers to contractors, GIO provides a united voice for the sector. The living green infrastructure we promote includes both natural vegetative systems and green vegetative technologies located in urban, suburban and rural areas. These include: urban trees, forests and woodlots; bioswales, wetlands, waterways and riparian zones; meadows and agricultural lands; green roofs and green walls; and parks, gardens and landscaped areas. These features of our buildings, yards and neighbourhoods play a fundamental role in the network of infrastructure that supports our quality of life in Ontario.

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