

VIA email (OntarioAdapts@ontario.ca)

January 20, 2018

Ministry of the Environment and Climate Change
Strategic Policy Branch
77 Wellesley St. West, 11th floor
Toronto, ON M7A 2T5

Re: Ontario's Approach to Climate Change Adaptation (EBR Registry Number: 013-1520)

Over the last nine years the Green Infrastructure Ontario (GIO) Coalition has successfully promoted the implementation of 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 green infrastructure we promote includes natural and human-made elements that provide ecological and hydrological functions and processes. Green infrastructure can include components such as natural heritage features and systems, parklands, stormwater management systems, street trees, urban forests, natural channels, permeable surfaces, agriculture/urban agriculture and green roofs.

GIO commends the Ministry of the Environment and Climate Change (the Ministry) for embracing meaningful consultation and offering the opportunity to comment on the proposed approach to climate change adaptation, although we feel that the information provided through the EBR is limited and considerable ambiguity exists around the approach.

There are a number of existing non-profit organizations that are already working on climate adaptation. The government should ensure that any new entity created does not draw funds or business away from these existing organizations that already have established networks and institutional knowledge, but instead works collaboratively with them to support climate adaptation in Ontario.

GIO was particularly encouraged to see the proposed development of a more strategic and coordinated whole-of-government approach to managing climate change risks and incorporating climate change considerations into government ministries and agencies. We strongly recommend that the Ministry ensure that any whole-of-government approach includes a holistic review of related provincial legislation, policy frameworks and guidance to identify and mitigate potential conflicting directions for municipalities. The Government of Ontario has

several ministries with proposed regulations/guidelines/funding mechanisms that GIO believes could play a role in climate adaptation. GIO recommends the following action be taken by the Province:

- The MOECC's Low Impact Development Stormwater Management Guidance Manual should be finalized as soon as possible.
- The MOI's proposed municipal asset management planning regulation should be finalized. GIO promotes the inclusion of living green infrastructure assets in this regulation.
- The MOI's bilateral agreements with Infrastructure Canada through the Investing in Canada Plan should include a 15% allocation for living green infrastructure. This will generate significantly more public benefits than a grey infrastructure only approach.

Respectfully,



Deborah Martin-Downs, Chair
Green Infrastructure Ontario Coalition
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CC :

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