



Green Infrastructure Ontario Coalition Comments on the Conservation Authorities Act Discussion Paper

In response to the request for comments on the Province's Conservation Authorities Act Discussion Paper, the Green Infrastructure Ontario Coalition (GIO) has reviewed the discussion paper and provides the following comments.

GIO is a collaborative alliance of businesses, not-for-profits, community groups, and local governments from across Ontario working to promote and support green infrastructure across the province.

GENERAL COMMENTS

Conservation Authorities (CAs) are effective and integral stewards of Ontario's water and other natural resources. Their watershed management work protects Ontario's water, helps local communities plan for sustainable growth, and supports Ontario's environmental priorities. They also help grow Ontario's green infrastructure network through expert environmental management. These important functions are becoming even more critical as communities continue to adapt to the new realities of climate change. Going forward, CAs require greater resources and collaboration to deliver consistent province-wide guidance in implementing the province's water quantity and quality, natural heritage planning, and climate change goals.

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 the natural capital, semi-natural areas, and vegetative technologies that are designed or managed to deliver a wide range of infrastructure functions. It includes everything from tree-lined streets, urban parks and gardens, to green roofs, urban agriculture, soils, 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) usually has only a single purpose and benefit. Green infrastructure investments have been shown to have a high return on investment, provide job opportunities, and can be a cost-effective complement (or alternative) to grey infrastructure.

CONSULTATION QUESTION COMMENTS

Question #3a – What resource management programs and activities may be best delivered at the watershed scale.

- Integrated water management plans should be developed and delivered at the watershed scale: Integrated water management, including the use of various forms of green infrastructure, is an effective tool for incorporating provincial and federal policy and science into local decision-making and ensuring cooperation among various authorities and partners. It is an important opportunity to manage for the interdependencies and synergies between stormwater, wastewater, and potable water systems across a watershed. The province should continue to empower CAs to develop these plans to ensure natural resources, and water in particular, are managed sustainably for environmental, economic, and social uses.
- The watershed scale is best suited for establishing water quality and quantity targets based on the characteristics of receiving waters: Watershed-level water targets should be set and used to inform provincial and municipal oversight of land development and retrofit activities within the watershed. This would help prevent erosion and flooding, reduce nutrient and other pollutant loadings, maintain water balance, recharge groundwater, and protect drinking water supplies from stormwater runoff.
- It is important that natural heritage system planning occur at the watershed scale: Watershed level natural features need to be protected and enhanced so they continue to provide significant ecosystem services.

Question #3b – Are current roles and responsibilities authorized by the Conservation Authorities Act appropriate? Why or why not? What changes, if any, would you like to see?

We recommend the following changes to the roles and responsibilities authorized by the Conservation Authority Act:

- Formalize and expand the relationship between CAs and relevant Ontario provincial ministries: Conservation Authorities have developed strong working relationship with various provincial ministries through programs and services that intersect with many ministry mandates. Formalizing and expanding these relationships would include renewing the MNRF-CA relationship, formalizing the MOECC-CA relationship, and exploring opportunities with other ministries such as OMAFRA, MMAH, and MEDEI.
- Formalize the role of CAs in green infrastructure implementation and promotion: Some Conservation Authorities play a crucial role in implementing green infrastructure and the related concept of low impact development (LID) in Ontario. The province needs to ensure that there is a strong and progressive policy framework to guide the implementation of storm water management including low impact development measures. CAs and municipalities are in the best position to negotiate the integrated design of SWM measures. The province should delegate environmental compliance approvals for SWM to CAs or municipalities to remove one of the barriers to the implementation of LID in new and existing developed areas. This would support implementation of the province's policy goal of minimizing stormwater runoff, improving water quality and using rain where it falls.

- Acknowledge role of CAs in supporting natural heritage implementation under the Planning Act: Natural heritage is a key component of Ontario's green infrastructure network. There is currently no provincial standard and only limited provincial guidance for natural heritage system planning. Many CAs fill the gap by providing strong science and policy support to municipal responsibilities related to land use planning under the Planning Act and the Provincial Policy Statement. The province should acknowledge the need for a local watershed-based implementation mechanism and explicitly acknowledge the importance of CA developed natural heritage systems for the watershed plans and as support for municipal official plans. Greater clarity could be provided in the Act on the role CAs have in natural resource management in the watershed. This would ensure better integration and efficiency and ultimately more protection and expansion of green infrastructure.

Question #3c – How may the impacts of climate change affect the programs and activities delivered by conservation authorities? Are conservation authorities equipped to deal with these effects?

The reality of climate change makes CA programs and activities even more integral to environmental management of the province's water and natural resources. CAs are well positioned to help municipalities and the province to 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.

Question #3d – Is variability in conservation authorities' capacity and resourcing to offer a range of programs and services a concern? Should there be a standard program for all authorities to deliver?

CAs have unique watersheds with a range of environmental features and urbanization levels that require context specific management. To provide equitable and effective management they should have a baseline standard set of responsibilities combined with the flexibility to adapt to changing contexts and issues.

Question #3f – Are there opportunities to improve consistency in service standards, timelines and fee structures?

Support a collaborative approach to ensure equitable province-wide technical capacity for CAs. 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, great lakes water quality objectives, and more.