

Environment and Climate Change Canada
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Re: Comments on the proposed Federal Sustainable Development Strategy for 2016–2019

The Green Infrastructure Ontario (GIO) Coalition is pleased to provide comments on the proposed Federal Sustainable Development Strategy.

The GIO Coalition supports the federal government's efforts to create a sustainable economy, protect the environment and enhance Canadians' well-being.

Living green infrastructure can make a significant contribution to the priorities outlined in the federal government's proposed new Sustainable Development Strategy. Living green infrastructure includes the natural capital, semi-natural areas, and vegetative technologies that are designed or managed to deliver a wide range of infrastructure functions. This includes everything from tree-lined streets, urban parks and gardens, to green roofs, urban agriculture, soils, and bioswales. With 80% of the population living in urban areas, urban ecosystems such as these have the greatest impact on human health and well-being.

One of the key rationales for green infrastructure is its ability to provide a multitude of benefits in addition to its infrastructure functions. In contrast, most grey infrastructure has a single purpose and benefit. Green infrastructure investments have also been shown to have a high return on investment, provide job opportunities, and can be a cost-effective complement (or alternative) to grey infrastructure.

In addition to the high level comments provided above, we have a number of specific suggestions below which we hope the government will consider as it finalizes its new Sustainable Development Strategy. Incorporating provisions for living green infrastructure will support the government's targets related to climate change, jobs and innovation, water management, natural heritage ecosystem protection, and human health and well-being.

Target 1.2: Resilience to Climate Change

‘Investing in infrastructure to help protect communities from climate change impacts’ is presented as a key priority for the federal government in 2016–2019 with regard to building resilience to climate change. The GIO Coalition suggests that the scope of this priority be broadened to include living green infrastructure assets such as urban forests, green roofs, green walls, wetlands, parks, and bioswales. Protection and enhancement of living green infrastructure, particularly in and near urban areas, is critical for building resilience to increasingly severe weather events, while also providing mitigation benefits by sequestering carbon and lowering energy use. These important opportunities may be missed if they are not emphasized in a resilience focused framework.

Target 1.5: Real Property Environmental Performance

The GIO Coalition considers that the federal government’s Sustainable Development Strategy for 2016-2019 currently overlooks the potential for its buildings to incorporate on-site stormwater management and green roofs, which contribute to energy savings. The GIO Coalition urges the federal government to show stronger site-level leadership on sustainable development by looking beyond the building envelope by designing for the incorporation of living green infrastructure into government sites.

Target 2.1: Clean Technology and Green Infrastructure

The GIO Coalition suggests that the federal government adds living green infrastructure—which can help achieve the government’s goals to protect water quality and human health as well as reduce GHG and air pollutant emissions—to the infrastructure types earmarked for investment as part of this Strategy. ‘Living green infrastructure’ should be specified as an example, along with water treatment and clean energy infrastructure, on Page 20; and should be included as an additional bullet under ‘Implementation Strategies’ on Page 22.

Target 2.3: Water Management in Federal Government Operations

The GIO Coalition urges the government recognize the importance of stormwater management in its operations. The water management section of the government’s strategy includes only one reference to runoff—as the last implementation strategy (Page 22). The GIO Coalition urges the government to demonstrate leadership in this area by including a greater emphasis on stormwater management to meet water quality, water quantity and water balance objectives throughout this section.

Target 2.6: Sustainable Forest Management

Urban forests are key in helping communities adapt to climate change by mitigating stormwater runoff and reducing the urban heat island effect. Unfortunately, Canada’s urban forests are under threat from rapid urban development and infill, invasive pests and violent storm events. We suggest that the section overview (Page 25) includes a paragraph on urban forests and that protection and enhancement of urban forests are integrated into both implementation strategies.

Target 2.7: Sustainable Agriculture

Urban agriculture is a growing component of sustainable agriculture which requires federal government support. Urban agriculture decreases energy use associated with long-distance transportation and helps reduce harmful runoff and increase shading, to cool urban areas to counteract urban heat island effect. Urban agriculture provides health and well-being benefits for city dwellers and helps provide communities with a greater appreciation for where food comes from. The GIO Coalition therefore suggests that the government's Sustainable Development Strategy include reference to urban agriculture.

Target 3.3: Terrestrial Ecosystems and Habitat Conservation

The GIO Coalition suggests that the government include reference to natural capital and ecosystems in urban and suburban areas. Further, the federal government should emphasize the importance of protecting and enhancing connectivity and the green infrastructure system, especially in linking rural ecosystems and habitats to urban ones and enabling greater protection and enhancement of pollinator habitat, biodiversity, and environmentally significant migratory routes for birds in urban areas.

Target 3.7: Connecting Canadians with Nature

The GIO Coalition supports the inclusion of this target in its Sustainable Development Strategy, and applauds the government's plans to protect and enhance natural areas and support conservation activities. However, we urge the federal government to show greater leadership in protecting urban ecosystems—where the majority the country's population will most commonly interact with nature. In addition to municipal parks and greenspace, urban nature can include many forms of living green infrastructure, include bioswales, green roofs, urban agriculture and street/backyard trees.

There is growing evidence to support that greenspace and natural areas directly address numerous health issues, thereby making their protection and enhancement a cost-effective health promotion strategy. With most of Canada's population living in urban areas, urban ecosystems have the greatest impact on human health and well-being.

Target 4.10: Water Resource Management

Integration of living green infrastructure that regulates the nutrient and hydrologic cycles can help offset costs associated with water treatment, flood and erosion impacts. Municipal and provincial governments have begun to demonstrate action in this area due to the benefits of incorporating green infrastructure in stormwater management—they require Canada's support. The GIO Coalition urges the federal government to show support for municipalities in incorporating living green infrastructure assets into their asset management plans. We also suggest that the implementation strategy related to research on Page 48 includes research into performance measurement and/or quantification of the benefits of green stormwater infrastructure to support true integrated adaptation planning and asset management. We further suggest that 'living green infrastructure' is listed as an example of green infrastructure under the water technology implementation strategy on Page 48.

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 Canada. However, just as for any other infrastructure, this living green infrastructure requires support from senior levels of government.