

By Email Elizabeth.Elder@ontario.ca

February 9, 2018

Elizabeth Elder
Senior Policy Advisor
Ministry of Economic Development, Employment and Infrastructure
Infrastructure Policy Division, Policy and Planning Branch
900 Bay Street
Floor 5, Mowat Block
Toronto, ON
M7A 1C2

RE: EBR Posting 013-1907 - Building Better Lives: Ontario's Long-Term Infrastructure Plan 2017

The Green Infrastructure Ontario (GIO) Coalition commends the Province on the release of its draft Long Term Infrastructure Plan. We would like to extend our collective knowledge and support to help optimize the upcoming investments in Ontario's green infrastructure and to consult with the Ministry of Infrastructure as it advances infrastructure policy and planning. Below are our comments regarding the EBR notice and supporting documents.

1. Include living green infrastructure assets in the plan

Green infrastructure assets should be included as assets in the plan and incorporated into the asset management planning of relevant ministries. This will align the plan with the growing number of provincial plans and policies that recognize green infrastructure as an important feature to be incorporated, protected and managed in Ontario communities. An area of particular alignment exists in Section 2.2 of the plan:

“The Province will also focus on aligning infrastructure planning decisions with municipal official plans. Official Plans are required by the Planning Act and must include public consultations, conform to the Growth Plans (where applicable) and be consistent with the Provincial Policy Statement, 2014.”

This connects directly to green infrastructure in two ways:

- 1) The Provincial Policy Statement (2014) under the Planning Act includes direct reference to the promotion of green infrastructure as a complement to infrastructure (Section 1.6.2).

2) The Growth Plan for the Greater Golden Horseshoe (2017) includes support for green infrastructure in several sections related to complete communities, stormwater management, and climate change.

Municipalities will increasingly need to plan and manage new and existing green infrastructure assets and the province should take this opportunity to lead by example. There are several examples of jurisdictions within Ontario that have already incorporated green infrastructure into their asset management plans, including:

- York Region's [Corporate State of Infrastructure Report](#)
- City of London's [Corporate Asset Management Plan](#)
- Town of Richmond Hill's [Asset Management Plan](#)

2. Dedicate 15% of infrastructure funding to green infrastructure as defined by the Provincial Policy Statement

As the Province continues negotiations regarding bilateral agreements with the federal government to finalize the implementation of Ontario's allocation for the next phase of infrastructure funding, GIO urges the Province to dedicate 15% of funding toward green infrastructure as defined by the Provincial Policy Statement (defined below). As stated above, green infrastructure advances many of the Province's existing strategies and initiatives. Furthermore, green infrastructure provides a unique opportunity for sustained employment; over 73,000 jobs in Ontario in 2007 were provided by landscape horticultural industry alone (which is just a fraction of the total green infrastructure industry)¹. Dedicated funding will help ensure that this vital infrastructure is a viable option.

3. Require green infrastructure be included in life-cycle analyses

GIO is pleased to see an emphasis on life-cycle analysis in the plan. Life-cycle analyses should include a range of alternatives, including green infrastructure, based on full life-cycle costs and integrated planning when undertaking a project. As an example of the benefits of including green infrastructure in such an analysis, New York City examined the differential cost of grey infrastructure only vs grey and green infrastructure and found the green alternative to be \$1.5 billion less².

4. Addressing the Changing Climate

GIO was pleased to see the Province's emphasis on designing and building resilient infrastructure to mitigate and adapt to the impacts of climate change. GIO supports the need for reducing emissions and using lower-

¹ The impact of ornamental horticulture on Canada's economy <http://www.coha-acho.ca/pdf/Final%20Report%202009-04-27.en.pdf>

² NYC Green Infrastructure Plan
http://www.nyc.gov/html/dep/pdf/green_infrastructure/NYCGreenInfrastructurePlan_ExecutiveSummary.pdf

carbon building materials as cited in this section. Beyond grey or “over-engineered solutions”, this section should include reference to green infrastructure as a key tool for building resilience. Avoidance/protection of natural features and the inclusion of other green infrastructure for their multiple community benefits are a great example of impactful infrastructure that can offer triple bottom line – economic, social and environmental – benefits.

Green Infrastructure Ontario Coalition Background

Over the last nine years the GIO Coalition has been successfully promoting the implementation of green infrastructure across Ontario. GIO is an alliance of organizations from many different sectors across the province that have a common vision of a healthy, green Ontario where the economic, social, environmental and health benefits of green infrastructure are fully realized. The term “green infrastructure” now in use in Ontario was originally coined by GIO and was formalized in the Provincial Policy Statement under the Ontario Planning Act, as follows:

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, and green roofs.

Respectfully,



Deborah Martin-Downs, Chair
Green Infrastructure Ontario Coalition
Contact: info@greeninfrastructureontario.org