

April 7th, 2018

Nisha Shirali
Senior Policy Analyst
Ministry of the Environment and Climate Change
Policy and Program Division, Environmental Policy Branch
40 St Clair Avenue West
Toronto ON
M4V 1M2

Re: Watershed Planning Guidance

The Green Infrastructure Ontario (GIO) Coalition strongly supports the province's development of watershed planning guidance. Watershed planning is a great opportunity for organizations to work together towards healthy land, water, species, and people in Ontario. Including green infrastructure in the guidance document will help support the implementation of the four provincial land use plans, the Provincial Policy Statement (2014), as well as Ontario's recent regulation on asset management planning for municipal infrastructure. The inclusion of green infrastructure will also support the goals of watershed planning by contributing to:

- A shift towards an ecosystem-based water balance approach to stormwater management.
- Improved urban biodiversity.
- Provision of ecological services which can mitigate impacts of climate change.
- The connectivity of natural heritage features.

We would like to put forward a few suggestions we hope the Ministry will consider as it finalizes the new guidance.

General Comments.

The coalition is encouraged by the draft document's inclusion of green infrastructure in multiple sections. The provincial land use policies clearly state green infrastructure should be considered when planning more resilient complete communities. Watershed planning is an effective mechanism for this to occur, therefore the document should provide more detailed guidance related to the green infrastructure components. Specifically, we suggest the following changes:

- Section 2.1 would benefit from an outline of how to undertake green infrastructure planning as part of the watershed and subwatershed planning processes.
- Section 4.3 should provide direction on how green infrastructure components, like urban tree canopy cover and low impact development measures, should be considered when characterizing existing watershed conditions.

- Page 54 introduces the eight watershed planning components and subsection 6.5 is described as “Interconnections with natural heritage features, areas, and systems, as well as the benefits of green infrastructure”. Yet, the content in section 6.5 in the draft document focuses entirely on the natural heritage system and does not mention green infrastructure. It is recommended that green infrastructure content be added to provide guidance on how the benefits should be considered in watershed planning.

The draft document intends to direct watershed planning for the purpose of informing land use planning decisions. This is one specific use, but watershed plans have been developed for many decades for a variety of purposes. This means the scope can often be broader and varied depending on the use and location. Local circumstance and specific watershed conditions should still drive what components are necessary to study. The draft document should clearly state that watershed planning can consider additional elements beyond that which is identified in the document and that local circumstances can define the watershed components necessary to study.

From an editorial perspective, overall the draft document is very high level in some sections while highly technical in others. It is recommended that the document be edited, with significant content added, to make sure it is consistent, clear, and includes the relevant level of detail in each section.

Natural Heritage System

There are strong relationships between watershed and natural heritage system (NHS) planning. Currently, the draft document’s directions do not discuss the full scope of NHS planning at different scales. This makes it unclear what system(s) should be integrated in to the watershed planning process. There is also now an inconsistency between provincial policies and the draft document on whether terrestrial and aquatic system planning elements are in or out of scope of watershed planning. In the provincial plans, natural heritage systems are defined by the province at the provincial scale and supporting policy does not require NHS planning through the watershed planning process. However, the draft document appears to promote NHS planning as a component of watershed planning. This is a positive step, and it is recommended that terrestrial and aquatic system planning be clearly required to be in the scope of watershed planning and that municipal and conservation authority NHS work be discussed in section 6.5.

Climate Change

The reality of climate change makes watershed planning an important component of land use decision making. The coalition supports the inclusion of climate change considerations in the draft document. It also lauds the province for recognizing that green infrastructure provides important ecological services which can mitigate impacts of climate change and highlights that such features are typically cheaper to protect and manage compared to the lifecycle costs of traditional grey infrastructure approaches.

Climate change introduces increased complexity to the watershed planning process, and this draft document contains very little specific guidance on how to consider the effects of climate. As this is a consideration that has been somewhat limited in past watershed planning, yet is very important for future watershed planning, more detailed technical guidance should be provided. This document should be sure to include directions on how to

characterize and assess potential impacts of climate change, but also how to incorporate opportunities associated with climate change adaptation measures.

Role of Conservation Authorities

The roles and coordination section (2.7) of the draft document contains sub-sections for municipal and provincial roles, but it should also in a section on the role of Conservation Authorities (CAs). CAs should have a clear function in watershed planning due to their long-established role in managing watersheds. Many CAs also have valuable local expertise acquired through on-the-ground work and/or extensive monitoring, data collection, and mapping of their watersheds. It may be particularly appropriate for CAs to act as lead and coordinator of watershed plans where the scale of the watersheds crosses municipal boundaries.

Cost-Benefit Approach

The coalition supports the recommendation that municipalities consider a cost-benefit approach to evaluating land use and management scenarios. The draft document directs them to consider ecological and human benefits of various land use and management scenarios, while also evaluating the lifecycle costs and risks associated with different servicing/infrastructure alternatives. We commend the draft document for illustrating the case of stormwater management alternatives using green infrastructure, but we would recommend the language change from “municipalities may consider the costs and benefits of green infrastructure and low impact development versus traditional grey infrastructure” to “municipalities should consider the costs and benefits of green infrastructure and low impact development versus traditional grey infrastructure”.

Green Infrastructure Ontario Coalition Background

Over the last nine years the GIO Coalition has been successfully promoting 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 both natural systems and green technologies that support natural systems located in urban, suburban and rural areas.

www.greeninfrastructureontario.org

Contact: Michelle Sawka, 416-661-6600 x 5337 msawka@greeninfrastructureontario.org