

January 28, 2019

Nathaniel Aguda  
Environmental Policy Branch  
40 St. Clair Avenue West  
10th floor  
Toronto ON M4V 1M2  
Canada

**Re: Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan (EBR #013-4208)**

Dear Mr. Aguda,

Thank you for the opportunity to comment of the proposed Made-in-Ontario Environment Plan.

The Green Infrastructure Ontario (GIO) Coalition is a multi-sectoral alliance comprised of private sector companies, industry associations, municipal and regional governments, community groups, and not-for-profit organizations. Together, we promote the implementation of green infrastructure across Ontario by providing a united voice for this vital and growing sector.

Green infrastructure includes everything from tree-lined streets, wetlands, urban parks and gardens, to green roofs, meadows, woodlots, grassed areas, urban and rural agriculture, soils, and bioswales. It provides a range of services that can make a substantial contribution towards climate change adaptation, and important contributions towards climate change mitigation and emissions reductions. Such practices are a 'win-win' approach to tackling climate change, in part because they also help deliver multiple other social, economic and environmental benefits. Green infrastructure has also been shown to have a high return on investment, create jobs, and can be a cost-effective complement (or alternative) to traditional grey infrastructure. In fact, the green infrastructure sector is already an important source of jobs – it employs over 150,000 people across the country. This includes people who work at small and large businesses as designers, growers, landscape architects, manufacturers, contractors and maintenance professionals.

GIO strongly recommends that the 'A Made-in-Ontario Environment Plan' incorporate policies, programs and financial mechanisms that will support efforts to implement green infrastructure practices. We offer the following comments and recommendations for the Ministry's consideration as it finalizes the Environment Plan and moves through to implementation.

## General Recommendations

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GIO agrees that a clean environment is essential to our economy, wellbeing, and healthy communities. We were pleased to see the Environment Plan provide clarity on Ontario priorities, goals, and actions related to protecting the environment and addressing climate change. In general, the Environment Plan would benefit from providing more information on how these goals and actions will be advanced and implemented. GIO recommends that the MECP work with municipalities, Conservation Ontario, Conservation Authorities, and other provincial ministries as key implementation partners to leverage existing expertise, experience and networks at the local and regional scale to refine key initiatives identified in the Environment Plan and move forward collaboratively to action.

GIO also recommends that the Environment Plan ensures there is a clear link between climate change impacts and stormwater management. Page 15 cites an intention to consider how stormwater financing could be updated to improve investment and support new technologies and practices. Climate change impacts should be considered in these financing options to ensure communities complete their due diligence in assessing and planning these systems to meet expected increased level of service needs resulting from extreme precipitation.

GIO is pleased that the Environment Plan has committed to regular reporting on progress and results. It is recommended that an Implementation Plan be developed to enable the Province to undertake consultations with key sectors in order to identify the actions and tasks that will be required for successful implementation. Developing metrics and key performance indicators to set targets and measure progress should be a key component of the Implementation Plan.

## Green Infrastructure Recommendations

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To ensure clarity around the definition of green infrastructure and alignment to policy statements under section 3(1) of the Planning Act, we recommend the Environment Plan include a direct reference to or inclusion of the Provincial Policy Statement (2014) definition of green infrastructure:

“Green infrastructure: means 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.”

The Environment Plan would also benefit from stating that strategic implementation of green infrastructure can reduce flood risk, improve stormwater management and achieve numerous social and economic co-benefits for communities. Policies established at the provincial level are important to guide science-based stormwater management at the municipal level and the Environment Plan should give clear priority to low impact development (LID) and green infrastructure practices.

The following list highlights key actions to support green infrastructure that the Province should consider when finalizing its Environment Plan and looking towards implementation:

- Provide province-wide support for municipal stormwater management fee programs.

- MECP should fund incentive programs to support LID and green infrastructure in municipal infrastructure projects and in greenfield and redevelopment projects.
- Finalize and implement the Low Impact Development Stormwater Management guidance manual and runoff volume control standard.
- Implement a “consider green infrastructure first” policy. This would require infrastructure projects consider whether a green infrastructure approach will address the community’s need. Instead of defaulting to familiar grey solutions like dikes and pipes, governments should first should look at restoring wetlands or implementing low impact development solutions.
- Ensure all levels of government allocate a minimum of 15% of infrastructure funds to green infrastructure investment for climate change resilience. Essentially, drive investment in climate resilient infrastructure through protection and creation of green infrastructure assets by allocating a percentage of infrastructure spending to these practices. This would include funding for specific green infrastructure projects and for projects where green infrastructure is integrated as a complementary practice (eg. transit, pipe retrofits).
- Ensure the support of green infrastructure projects through relevant permitting and approvals.
- Require financial planning that supports the full cost recovery of water, wastewater and stormwater infrastructure, considers the life-cycle cost of the infrastructure, and plans for the long-term.
- Encourage businesses and municipalities to employ a comprehensive economic and environmental footprint analysis to assess and compare green versus gray infrastructure and the co-benefits of green infrastructure solutions in capital projects.

We would be please to provide any additional information required. Please do not hesitate to contact Michelle Sawka with any questions ([michelle.sawka@trca.on.ca](mailto:michelle.sawka@trca.on.ca), 647-287-6540).

Sincerely,



Deborah Martin-Downs  
Chair, Green Infrastructure Ontario Coalition

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