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Re: Proposed Municipal Asset Management Planning Regulation

The Green Infrastructure Ontario (GIO) Coalition strongly supports the province's leadership in integrating green infrastructure into its new regulation for municipal asset management planning. Including green infrastructure in the definition of "infrastructure assets" and as a key lifecycle cost management strategy is an important step to support sustainable and cost-effective infrastructure spending in Ontario's municipalities.

Including green infrastructure also helps align the new regulation with the growing number of provincial plans and policies that recognize green infrastructure as an important tool for communities in Ontario. An area of particular alignment exists with the direction in the new regulation for municipalities to develop strategic asset management policies that include:

"a process to ensure that asset management planning is aligned with Ontario's land-use planning framework, including any relevant policy statements issued under section 3(1) of the Planning Act; provincial plans as defined in the Planning Act; and, municipal official plans."

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.

Additionally, [Ontario's 10-year Infrastructure Plan](#) includes green infrastructure as a practice that can reduce the need for costly, large-scale infrastructure solutions. Green infrastructure is specifically cited as a way to reduce the burden on built systems, and integrating it into the regulation directly supports the direction outlined in the 10-year Plan.

Municipalities need to plan and manage new and existing green infrastructure assets and they should be encouraged to use the same framework as they use for grey infrastructure assets. In addition to offering our high level support of the province's efforts to encourage municipalities to integrate green infrastructure in to municipal asset management planning, we would like to put forward two specific suggestions below which we hope the Ministry will consider as it finalizes the new regulation.

- 1) **Define “green infrastructure”**: To ensure clarity around the definition of green infrastructure and alignment to policy statements under section 3(1) of the Planning Act, we recommend including 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.”

- 2) **Revise the definition of “infrastructure assets” to ensure green infrastructure assets are not required to be tangible capital assets**: We suggest broadening the definition of “infrastructure assets” beyond tangible capital assets (TCAs) to avoid a potential contradiction between the regulation and Public Sector Accounting Board guidance. The draft definition of “infrastructure assets” in the proposed regulation could be interpreted to only include TCAs. The term TCA does not include green infrastructure assets, according to the current guidance from the Public Sector Accounting Board. Not all infrastructure assets owned by a municipality are TCAs, and assets do not need to be TCAs to benefit from inclusion in asset management planning. We propose an alternate definition below for your consideration:

“Infrastructure Assets” are built and natural assets that are directly owned by a municipality or consolidated on the financial statements of a municipality, including tangible capital assets, and may include green infrastructure, but do not include assets that are managed by a joint municipal water board.

- 3) **Set a timeframe to require green infrastructure’s integration to asset management plans**: Require green infrastructure be integrated in to asset management plans following a five year phase in period. This would provide time to develop guidance documents and establish the various training, accounting and regulatory elements needed to implement green infrastructure asset management across the province.

Green Infrastructure Ontario Coalition Background

Over the last seven 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.

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