

January 18, 2019

Michael Helfinger
Intergovernmental Policy Coordination Unit
Ministry of Economic Development, Job Creation and Trade
900 Bay Street, Hearst Block, 7th Floor
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Ken Petersen
Provincial Planning Policy Branch
Ministry of Municipal Affairs and Housing
777 Bay Street, 13th floor Toronto, ON M5G 2E5

Re: Schedule 10 of Bill 66, Restoring Ontario's Competitiveness Act, 2018 and associated regulations (ERO #013-4293, #013-4125, #013-4239)

Dear Mr. Helfinger and Mr. Petersen,

Thank you for the opportunity to comment on Schedule 10 of Bill 66, Restoring Ontario's Competitiveness Act, 2018.

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.

As drafted, Schedule 10 of Bill 66 will have significant negative consequences on our province's green infrastructure system by removing vital protections in the Greenbelt Plan, Oak Ridges Moraine Conservation Plan, Lake Simcoe Protection Plan, the Growth Plan and the Provincial Policy Statement, facilitating a patchwork approach to environmental protection in Ontario. Ontario's current land-use planning and land conservation framework was developed over many years by both Progressive Conservative and Liberal governments. It provides critical protection to farmland, wetlands, woodlands, valley lands, other natural heritage features, key hydrologic features, freshwater, and natural linkage areas in the heavily developed Greater Golden Horseshoe Region. These features and networks span municipal boundaries and can only be adequately protected at a regional scale. The framework also currently encourages municipalities to consider green infrastructure in their stormwater management and climate change resiliency planning – potentially providing communities financial savings, as green infrastructure approaches have often been found to be less expensive and address many issues concurrently.¹

Schedule 10 also risks directly undermining many of the goals of the provincial government's own Made in Ontario Environment Plan.

The GIO Coalition therefore recommend that Schedule 10 be removed from Bill 66 by government MPPs at second reading.

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, 647-287-6540).

Sincerely,



Deborah Martin-Downs
Chair, Green Infrastructure Ontario Coalition

www.greeninfrastructureontario.org

¹ Green Infrastructure and Issues in Managing Urban Stormwater. Congressional Research Service. Online: <http://nationalaglawcenter.org/wp-content/uploads/assets/crs/R43131.pdf>