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Dear Mr. Aguda,

RE: Made in Ontario Environment Plan ERO #: 013-4208

Thank you for this opportunity to comment on the proposal mentioned above.

The Simcoe County Greenbelt Coalition (SCGC) is a coalition of ratepayers, naturalists, farmers, land conservancies, environmentalists and indigenous peoples. SCGC is comprised of 35 groups from across Simcoe County and the province who are concerned with sustainable community development, protection of natural heritage, water, and the Greenbelt.

Ontario's Environment Plan touches on many of these concerns and we feel compelled, therefore, to provide comments which reiterate the vision we have for our communities' future. Since the ERO document is broken down into four main objectives, we will provide our comments accordingly.

Notwithstanding the sections below, we would like to assert that anthropogenic climate change is a serious threat to our current and future world, including our economy, our air, water, and food security, and our health. It is clear that we must rapidly transition our energy systems away from fossil fuels to effectively combat climate change. For that reason, there is no doubt among experts that we need a strong emphasis on renewable energy, on carbon pricing in some form, and development and economic growth that ensures the needs of future generations are met. The government's Made in Ontario Environment Plan seems, as the wording suggests, to ignore the fact that this is a challenge that is planetary in scope, and so also misses the magnitude both of the climate change crises and the responses required to effectively address it. Without addressing these key planks noted above, the Made in Ontario Environment Plan's

incremental and isolated suggestions will not do nearly enough to address this most significant threat to our continued economic prosperity and social well-being. We feel, further, given the government's focus on economic performance, that it is germane to emphasize that jurisdictions currently taking these threats seriously are laying their foundation for the economy of the future. Ontario must take decisive action in this regard quickly or be left behind in future economies.

1. Protecting our air, lakes and rivers

We support the goal of protecting these invaluable components of our environment. However, we feel that the actions listed do not adequately address one of the main contributors of pollution to our air and climate - transportation and related land use planning.

In 2005, the Ontario Medical Association estimated that over 5,800 Ontarians died prematurely due to air pollution¹ and in 2014, it was estimated that every year 854 people in the Greater Toronto Area die prematurely due to air pollution.² 66% of the nitrogen oxides and 18% of volatile organic compounds (VOCs) that are linked to these deaths are attributed to transportation, including car traffic and movement of goods. The more that car or truck traffic is needed the more the pollution increases and the more damage there is to public health. It stands to reason, then, that reducing car dependency is good public policy, as outlined by several provincial health units³. This would include stronger transit investments, including active transportation infrastructure, eliminating sprawl and encouraging intensification. This focus on building our communities so that they support positive health outcomes is met and complemented further with the promotion and protection of green spaces and the co-benefits they provide.

Another reason to more strenuously incorporate smart land use planning reforms into Ontario's Environment Plan is that car dependency and commuting increase carbon emissions. Neptis reported that drivers in the outer suburbs of the GTA contributed 5200 grams of CO₂/day/person, which is almost 5x more than the comparable carbon emissions of someone living in the core of Toronto.⁴

Land use patterns that place housing away from jobs and planning policies that promote highways over transit and active transportation set in stone, so to speak, a pattern of high intensity carbon emissions activity that will continue into the foreseeable future, driving emissions higher and incurring greater cost for adaptation and mitigation.

¹ <https://ocfp.on.ca/docs/committee-documents/urban-sprawl---volume-1---air-pollution.pdf>

² http://www.simcoemuskokahealth.org/docs/default-source/hu-promo/V2_highlights-report.pdf?sfvrsn=0

³ http://www.simcoemuskokahealth.org/docs/default-source/hu-promo/V2_moh-report.pdf?sfvrsn=0

⁴

<http://www.neptis.org/publications/relationship-between-urban-form-and-environmental-quality/chapters/air-pollution>

We are seeing the impacts of climate change on Ontario's water already. Temperatures in the Great Lakes Basin are on the rise and water levels are dropping.⁵ Of Ontario's greenhouse gas emissions, 35% come from transportation - this is 34% higher than compared to the 1990s.⁶ The trendline of carbon emissions is going in the wrong direction to ensure Ontario's environment remains healthy.

It is clear that more needs to be done to reverse this. While we appreciate that there is mention of "review of land use planning policies and laws to update policy direction on climate resilience", we are concerned by the lack of specificity in this regard in the plan, particularly in light of recent missteps with Bill 66 and schedule 10. This schedule would have effectively negated good land-use planning practices in Ontario. More recently announced proposed changes to the Places to Grow Act threatens progress made toward developing communities in Ontario that better address many of the concerns noted above. We strongly urge quick development and implementation of robust land-use regulations that drastically reduce transportation related carbon emissions in Ontario.

Recommendations:

- Re-focus land use planning on infilling and intensification versus allowing low density built form on fringes of existing communities as suggested in latest changes to Places to Grow Act.
- Uphold high density targets of Growth Plan to encourage less commuting, and encourage more efficient use of existing infrastructure
- Promote the use of green infrastructure, active transportation and transit investments through provincial land use policies and funding. This will help address the root cause of transportation emissions.
- Finish the Greenbelt expansion consultation started in 2018 and expand the Greenbelt over areas that provide high value ecosystem services, including wetlands, forests, moraines, aquifers, and significant groundwater recharge areas. These green spaces are key to keeping our air and water clean.
- Uphold the current policies of the Lake Simcoe Protection Plan but increase implementation effectiveness with supportive policies and tools.
- Invest in data gathering to understand our groundwater reserves and cumulative water taking impacts. Permits to take water currently operate without a solid understanding of the groundwater reserves we have or their cumulative impact across a watershed.
- Build on the suggestion of effective watershed management by increasing funds to conservation authorities to ensure up-to-date watershed monitoring and reporting, up-to-date wetland evaluations, and modernize floodplain maps that outline areas of flooding concern in light of increasing urbanization and ever increasing intense storm events.

⁵ <https://www.ontario.ca/page/climate-impacts-ontarios-aquatic-environment>

⁶ <https://eco.on.ca/blog/ghg-emissions-in-ontario/>

2. Addressing climate change

As we outlined earlier in our submission, we feel climate change action is most needed at the macro level, specifically with policies regarding carbon pricing, land use patterns, and conservation and protection. Since municipalities are bound to provincial policies, there must be recognition that the province can and should provide leadership to ensure uniform and effective adoption of climate change policies and actions.

Some of the items listed within the environment plan focus on individual actions and education. While there is an obvious need for individuals to make contributions, it's collective action that is most sorely missing and desperately needed. Human beings are capable of truly extraordinary things when we work together, and government must play a central role in structuring and incentivizing the mass collaborative effort required to effectively confront climate change. Transitioning to a low carbon economy is an urgent necessity. Doing so requires investments in transit, not highways; green infrastructure over expensive man made solutions; and an intentional focus and concerted effort to move us away from fossil fuels and towards a use of renewable energy that is far more efficient. Regardless of how much Ontario has already done to address climate change, our province must recognize that it has a responsibility to its own citizens to step forward and lead in creating and achieving a positive vision of the future. We cannot afford to abdicate responsibility to future generations.

We agree, as outlined in the Environment Plan, that building resilience to climate change is an important component of an effective action plan. In support of achieving this, we also agree with the Environment Plan that vulnerability assessments must be done so that we can prioritize and monitor action plans.

Further, as outlined by the Environmental Commissioner's Office, we know that preserving natural heritage is key to building Ontario's resilience to climate change. To support healthy biodiversity, we must ensure linkages between protected spaces, allowing for species passage and migration and enhancing resilience or abilities to withstand and recover from high impact events, such as the increasingly severe weather events related to climate change. Further, forests and wetlands are highly effective and cost efficient tools for flood prevention and drought resilience. Again, providing stronger protection, maintaining corridors and linkages between natural spaces, and protecting at a landscape level is, at minimum, what is needed as the basis for a climate resilience plan for Ontario.

We also want to point to the value of engaging and enabling local communities with regard to increasing resilience. The ability to respond quickly to rapidly changing circumstances is a key characteristic of resilience, and to this effect there is value in the local knowledge and expertise of citizens and community stakeholders groups, and to strengthening their knowledge and awareness of respective attributes and capabilities. In sum, resilience is well served by full,

accurate, and ready information, which is well used when placed in the hands of those its effective use of most effects, namely citizens in their respective communities.

Recommendations:

- Prioritize vulnerability assessments.
 - Ideally, the assessments will outline, by decade, the cost of climate change and assess a wide range of communities, including: indigenous, northern, and other vulnerable populations (children, homeless, seniors, impoverished).
 - The assessments should also include a wide range of sectors, including: health care, municipalities, tourism (those that are snow/cold dependent and those that are based on fisheries), agriculture, forestry (both as an industry as well as from a fire containment/risk management perspective).
 - Further, the assessments should address public health considerations including: future water supply and storm water management (in light of changing precipitation, droughts etc.), climate related health concerns, food security, costs to both private and public interests regarding storm events as well as cost and availability of insurance for homeowners.
- Properly fund climate data initiatives and ensure a transparent and accountable reporting process to the public. Ideally, the data will be easily accessible to the public in a timely fashion. This would also include data, and provide it in such a way, that community members are empowered with regard to actions they can take to make community based and community led contributions to combat climate change.
- Take the lead on preserving and conserving natural heritage and water systems. This should include policies within land use planning, incentivizing use of green infrastructure and technology, allowing municipalities to include green spaces and green infrastructure in their capital assets as well as providing funding to help municipalities transition to a low carbon economy.
- Full cost accounting of natural assets ensures decisions are made with the best information available and that an accurate cost-benefit ratio is known and applied. This provides a highly prudent decision making methodology and ensures Ontario uses its natural resources to achieve maximal benefit with utmost efficiency.
- Finally, government needs to recognize that combating climate change requires just as much a cultural shift as it does a technological shift. The government should show leadership in shifting consumer habits toward more efficient resource use.

3. Reducing litter and waste in our communities & keeping our land and soil clean

Reducing waste in our society is a laudable goal. From single use plastics to holding businesses responsible for their packaging, there remains a lot of work to be done. We suggest that waste needs to be addressed both at source and end points - we need to create less product that we know will end up as waste, and we need to be more effective at capturing and disposing of waste.

Plastics in Ontario's water has become more problematic as regulations have not been able to adequately address their capture and disposal.

Similarly, microplastics have become commonplace in our river and lake systems, affecting fish populations and aquatic ecosystems. They have also been commonly found in tap water around the globe⁷. A more recent discovery is finding these same microplastics in groundwater systems⁸. This is a risk to our water supply and public health and needs to be addressed quickly.

The environment plan also speaks to working with municipalities and businesses regarding litter clean up days and litter reduction strategies. We feel that there should be equal outreach and inclusion of community groups, including naturalist clubs and residents' associations, many of whom know their communities well and can organize residents in such efforts.

We also applaud the inclusion of a strategy to clean Ontario's soil. Groundwater contamination due to dumping untreated and often toxic soil from urban construction projects is a real problem in rural communities. There is a lack of oversight from the province on these operations, including tracking where soil is coming from and being shipped to, regular testing, and enforcement. We support the work and recommendations of the Ontario Soil Regulation Task Force, which is showing excellent leadership on these issues. We encourage the government to move forward with the review of its soil regulations and public review process.

Recommendations:

- Ban single use plastics in Ontario.
- Devise and implement a strategy for ensuring the true cost of waste is reflected at the point of purchase, and ensure the difference is passed on to municipalities to enable effective waste diversion and disposal. This echoes our comments above regarding full cost accounting, with the lack thereof effectively providing a taxpayer subsidy to wasteful producers. .
- Gather data on the prevalence of microplastics in Ontario's waterways and groundwater and devise an action plan accordingly.
- Update the MOECP's standards for wastewater treatment plants to include known pollutants such as pharmaceuticals, microplastics, and nanosilver, among others.
- Provide leadership and funding for community groups to help establish litter clean up days or litter reduction strategies for their communities.
- Continue with the soil regulations process to ensure that policies provide stringent regulations regarding testing, oversight, site monitoring, and rehabilitation policies for brownfield sites. There is also concern that municipalities and conservation authorities do not have adequate resources to properly manage dumping sites, both legal and

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<https://www.theguardian.com/environment/2017/sep/06/plastic-fibres-found-tap-water-around-world-study-reveals>

⁸ <https://phys.org/news/2019-01-microplastic-contamination-common-source-groundwater.html>

illegal, within their jurisdiction. Provincial support and oversight, therefore, is crucial to effective action on this front

4. Conserving land and greenspace

Ontario has a strong legacy of land conservation. Notably, many of our most successful land conservation policies (Niagara Escarpment, Oak Ridges Moraine, Living Legacy Land Use Strategy) were put in place by Conservative governments. We are pleased that the government seems intent on continuing this legacy by recognizing the importance of conserving land and green space as outlined in Ontario's Environment Plan.

Conservation of green spaces provides many co-benefits to Ontario.. Green spaces make the air healthier and water cleaner; they help control flooding events, resulting in less property damage from extreme storm events; they increase property values, boost economic development, and provide cost savings to taxpayers as they are much less expensive to service and provide mitigation co-benefits cheaper than built infrastructure.

Environmental Assessments and Land Use Planning

We view the recommendation of modernizing the environmental assessment process to “address duplication, streamline processes, improve service standards to reduce delays, and better recognize other planning processes” with concern. The environmental assessment process needs to uphold its main objective - “the betterment of the people of the whole or any part of Ontario by providing for the protection, conservation and wise management in Ontario of the environment”.

The Environmental Assessment (EA) Act already allows major infrastructure projects to sidestep in-depth studies due to the Class Environmental Assessments, which streamline the studies needed depending on project. This despite the fact that sometimes class categories, due to being viewed in isolation from the broader context, which is a crucial component given the environment is not a closed system, miss a level of detail in assessment that would support and enhance overarching EA objectives..

The consultation process outlined within the EA Act has to be strengthened and properly aligned with its intention, as it has largely become a perfunctory process. This would include incorporating much more meaningful government to government relations with indigenous communities to ensure their free, informed prior consent, as outlined by the United Nations' Declaration of the Rights of Indigenous Peoples.

The point to “Improve coordination of land use planning and environmental approval processes by updating ministry guidelines to help municipalities avoid the impacts of conflicting land uses” is vague enough to make us wonder about its intention. Will this include reducing buffers and easements? Removing the requirement to have natural heritage corridors within settlement

areas? Less protection from the undesirable side-effects of agriculture, or reducing the size of recognized habitats of endangered species? We feel the need to remind the government that the main purpose of environmental policies are not there to streamline development or land-use planning, rather these policies are meant to protect the ecosystems that our health and prosperity rely on. Accordingly, so long as they are achieving this goal, they should not be seen as superfluous or burdensome.

We believe that having land use planning that provides certainty for municipalities, developers, and the environment is the most efficient way forward. This means acknowledging areas of ecological, hydrological, social or cultural significance on a broad scale, utilizing a robust public engagement process that is fully accountable and transparent, in order to protect them from land uses that would damage their functional interdependence and ecological importance. Land outside of these protected zones could still access a more streamlined approval process or more permissive zoning, albeit with rigorous public consultation and appeals process intact. Such a process reflects principles of the precautionary approach, which asserts that everything must be considered valuable until it is demonstrated otherwise. This would achieve the balance between our growth (economic or otherwise) with the need to protect our current and future environment.

The suggestion to promote Ontario's parks is also welcome, but again, parks must be seen as a piece of a larger landscape and interdependent ecosystem. Promoting a park while allowing conflicting land uses to erode wildlife corridors, wetland complexes, or shorelines surrounding the park is self-defeating. Again, there is an overall need to listen to the science of climate change as well as the needs of natural systems, including the interpenetration of water and species flows, in order to sustain us into the future, and to then demarcate and protect these areas.

Recognizing the open-flow characteristic inherent in the health and co-benefit provision of natural systems is why we strongly recommend that the province continue the Greenbelt expansion review. The Greenbelt is a land use policy that provides certainty to farmers, municipalities, business, as well as, as this is key, to future generations of Ontarians. From a purely economic standpoint, as outlined by the Ontario Wine and Grape Growers' Association, the Greenbelt has allowed their industry to thrive, and there are numerous other examples of how it benefits Ontario's bottom line. It is time to recognize that a protected and expanded Greenbelt can be a core driver of Ontario's future livability and prosperity

Recommendations:

- Work with land trusts and conservancies to protect more land. We suggest donating orphaned crown land to land trusts and/or indigenous communities to allow them to lead in stewardship efforts.
- Expand the Greenbelt to preserve areas of "significant environmental or ecological significance". This should also include areas where natural cover is needed, including

the remaining one-third of the Lake Simcoe shoreline, around vulnerable aquifers, significant wildlife corridors, and covering and surrounding moraines.

- In order to allow conservation authorities to fulfill their key mandate to protect people and places from flooding, they need adequate funding to gather data and update floodplain maps, as well as strengthened powers to ensure that land use activities that could exacerbate flooding or property damage are stopped, adapted, or mitigated.
- Ensure that updating the Environmental Assessment Act and “coordination with land use planning” does not reduce protection for the environment, rather that it enhances community and indigenous collaboration and provides updates that reflect most recent science and approaches and truly reflects its primary objectives.

We appreciate the opportunity to provide our comments to this review. If you have any further questions, please feel free to contact us.

Sincerely,

Margaret Prophet on behalf of the Simcoe County Greenbelt Coalition (35 member groups)

Executive Director

www.simcoecountygreenbelt.ca

Cc

MPP Jill Dunlop

MPP Andrea Khanjin

MPP Caroline Mulroney

MPP Jim Wilson

MPP Doug Downey