The Ontario Headwaters Institute

October 21, 2019

To: Minister Steve Clark and staff minister.mah@ontario.ca; others
Provincial PPS multi-ministry team planningconsultation@ontario.ca

RE: Provincial Policy Statement Review – Proposed Policies as per ERO # 019-0279

The Ontario Headwaters Institute - a charity working to protect the province's headwaters, downstream watersheds, their natural heritage, and their receiving waters – and the co-signatories below offer the following comments on the review of the PPS.

While submissions from other organizations may address the perceived impact of specific clauses, and while some of the undersigned may send in other comments and/or sign other submissions, this submission focuses on three strategic recommendations we strongly urge the Government to consider.

Although expressed separately, the three recommendations combine to present a tapestry of sustainable planning, founded in watershed management and informed by meaningful public engagement.

1. Development Lacking a Lens on Sustainability Will Harm Ontario's Triple Bottom Line

The current review is founded not in the evolution of the PPS as a balanced framework to guide development while protecting the environment and public safety but in an almost singular obsession to, quoting the purpose on the Government website, "help increase the supply of housing, support jobs and reduce barriers and costs in the land use planning system."

While abandoning the historically thoughtful context of a normal PPS review is ill-advised at any time, it is irresponsible to tilt the PPS toward an excessive empowerment of development-as-usual at a time of a changing climate, threats to biodiversity, regional ecological integrity, and the gathering momentum of the sixth mass extinction.

What is needed in these circumstances are commitments to sustainable planning, complete communities, and sustainable building practices to protect Ontario's triple bottom line of our ecological, economic, and social wellbeing, not a slash and burn approach for short-term gain.

In addition, the current review is being delivered in a manner that:
- Excludes performance measures, which are essential to a meaningful review; and,
- Re-sets the clock for a fulsome review from 2024 to 2029.

We therefore believe that the current review upends the historic balance between environmental protection and development and ignores the imperative of embracing sustainable planning,

Recommendation 1: That the Government balance the current review either by injecting new commitments to sustainable planning, complete communities, and sustainable building practices into the draft or by committing to a fulsome review of the PPS in 2021 focused on those three attributes and supported by meaningful monitoring data not available in the current effort.

2. A Tenuous Commitment to Watershed Management

The PPS retains many of the existing references to watersheds or watershed management and adds others. We are particularly pleased to see the retention of the following section;

"2.2.1 Planning authorities shall protect, improve or restore the *quality and quantity of water* by:

a. using the *watershed* as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development".

Nonetheless, we are deeply concerned that this and similar wording might be rendered less meaningful by initiatives occurring outside of the review.

Wording that could be impacted by those outside initiatives includes reference to water, watersheds, wetlands, cross-watershed impacts, the water resource system, or hydrologic function, as well as phrases that state that sensitive water features should be protected, improved, or restored or that climate change might be partially addressed at a watershed level.

Initiatives taking place or that have taken place outside of the PPS review in this regard include:

a. Current discussions on core vs non-core activities in conservation authorities (CAs), in which the Province appears to continue to prefer a riparian-thin approach to watershed management and not a broader framework based on conserving natural resources, and which we understand also excludes much of the natural heritage, monitoring, and reporting efforts currently done by most CAs;
b. The letter from the Minister of Natural Resources and Forestry, written while discussion on the point above continue, telling conservation authorities to stop budgeting for non-core activities;
c. The proposed re-alignment of local and regional municipalities and their activities in conjunction with changes in CA mandates under amendments to the CA Act;
d. The proposed provincial standard to replace multiple guidelines required under O. Reg. 97/04 regarding Development, Interference with Wetlands and Alterations to Shorelines and Watercourses;
e. The anticipated report of the Province's Special Advisor on flooding; and,
f. The anticipated report of the Muskoka Watershed Advisory Group.

In contrast to these uncertain but potentially harmful changes to Ontario's proud evolution as a world leader in watershed management, we urge the Province, as we have for several years, to embrace the transition to a comprehensive framework for watershed management.

Recommendation 2: That the Government adopt a vision for watershed management based on:

- **2.1 Establishing provincial targets for watershed health similar to those in the How Much Habitat is Enough, a federal guideline;**
- **2.2 Embracing Integrated Watershed Management, including the allocation and integration of appropriate resources;**
- **2.3 Adopting standardized permitting practices, perhaps based on the Ontario Natural Heritage Reference Manual;**
- **2.4 Pursuing adaptive management, with an expanded framework for education, outreach, and public engagement to protect our watersheds; and,**
- **2.5 Including headwaters more comprehensively in watershed mapping, planning, monitoring, reporting, and restoration.**

Working to protect Ontario's Headwaters, Natural Heritage, and Watersheds
andrew@ontarioheadwaters.ca ♦ 416 231 9484

3. Empty Words on Trust and Transparency

In providing a link to the draft Made-in-Ontario Environment Plan (the draft plan), the Government has exposed itself to observations of a significant degree of hypocrisy.

First of all, as we have raised on several occasions to numerous ministers and staff, the Province does not have an environment plan. Cabinet may have what it considers a plan, but the Province only has a draft plan, and no decision notice on that plan has been placed on the Environmental Registry of Ontario.

In such a circumstance, presenting the plan as more than a draft is political posturing and not accurate.

In addition, while Cabinet may rightfully work to implement aspects of its draft plan, it is clearly ignoring the second principle, on Trust and Transparency and found on page 8, which states:

- We will provide Ontarians with the information and tools required – with a particular focus on real-time monitoring – to understand the current environmental challenges we face and how these challenges impact individuals, businesses and communities across the province.

Sadly, over the last 17 months the Government has, amongst other acts that impugn the draft plan:

- Regularly described environmental protection as red tape;
- Attempted, in a bill later withdrawn, to suspend the Clean Water Act in special by-law zones;
- Excluded almost all environmental stewardship organizations from an aggregate "summit"; and,
- Created a regulatory provision that allows proponents of development to pay a fee rather than take steps to protect endangered species.

In addition, in the Housing Action Plan and in this review, the Government has:

- Ignored direct requests for specific information during consultations on the Housing Action Plan and Bill 108 -- while omitting any mention of sustainable planning from summaries of public input;
- Not provided any performance measures for the PPS, as mentioned above; and.
- Repeatedly refused the number one request from the public in the PPS review -- for a simple tracked changes version of the proposed new policy statement which, it must be pointed out, has been acknowledged to have been prepared but was just not being made available to the public.

Each of these actions consciously focus on economic growth at the expense of environmental protection and/or violate the Trust and Transparency principle of the draft plan.

Recommendation 3: That the Government commit to the Trust and Transparency principle in its draft environmental plan by providing more information and conducting meaningful consultations on its proposed environmental initiatives.

Please feel free to contact the undersigned at your convenience for any clarification or further discussion.

Sincerely,

Andrew McCammon

Executive Director
cc: Co-signatories and others

Working to protect Ontario's Headwaters, Natural Heritage, and Watersheds
andrew@ontarioheadwaters.ca ♦ 416 231 9484

Co-signatories

1. Belfountain Community Organization, Judy Maybe, President
2. Blue Mountain Watershed Trust, Norman Wingrove, President
3. Bonnechere River Watershed Project, Kathy Lindsay, Chair
4. Climate Change Action Dufferin-Caledon, Nancy Urekar, Chair
5. Coalition on the Niagara Escarpment, Robert Patrick. President
6. Environment Haliburton, Terry Moore, Director
7. Friends of the Rouge Watershed, Jim Robb, General Manager
8. Friends of the Salmon River, Susan Moore, President
9. Friends of the Napanee River, Lawrence O'Keeffe, Chair
10. Grand River Environmental Network, Kevin Thomason, Vice-chair
11. Green Durham Association, Elizabeth Calvin, President
12. Hamilton Naturalists' Club, Gord McNulty, Conservation & Education Director
13. Midland-Penetanguishene Field Naturalists, Ken MacDonald, Program Director
14. Midhurst Ratepayers' Association, Sandy Buxton, President
15. North Pigeon Lake Association, Warren Dunlop, President
16. Nature Barrie, Dorothy McKeown, President
17. Ontario Rivers Alliance, Linda Heron, Chair
18. Ontario Soil Regulation Task Force, Ian McLaurin, Chair
19. Oxford Coalition for Social Justice, Bryan Smith, Chair
20. Protect Our Water and Environmental Resources (POWER), Doris Treleaven, President.
21. Save the Oak Ridges Moraine Coalition (STORM), Debbe Crandall, Director, Policy
22. Save the Maskinonge, Debbie Gordon, Chair
23. Sierra Club Peel Group, Rosemary Keenan, Director
24. Simcoe County Greenbelt Coalition, Margaret Prophet, Executive Director
25. Whole Village Property Co-operative Farm and Ecovillage, Brenda Dolling, President
26. York Region Environmental Alliance, Gloria Marsh, Executive Director
27. York Simcoe Nature Club, Jeanne Beneteau, President

Working to protect Ontario's Headwaters, Natural Heritage, and Watersheds
andrew@ontarioheadwaters.ca ♦ 416 231 9484