

June 23, 2021

RE: Municipal Comprehensive Review (Committee of the Whole Item H.2.4)

Dear Members of Council,

The Ontario Headwaters Institute writes to ask you to ensure that your Municipal Comprehensive Review takes a high-level path to protect your region's terrestrial and aquatic integrity and not merely positions to satisfy the requirements of the Growth Plan, absent a lens for sustainable land use planning.

Incorporated in Ontario, the Ontario Headwaters Institute is a federally registered charity. Originally focused on protecting headwater areas, where our watersheds start, supplementary letters patent issued in 2018 expanded our mandate to full watersheds, their natural heritage, and receiving waters such as the Great Lakes and Lake Simcoe.

This was a natural evolution, keeping pace with the development of or changes over the last 15 years, particularly from 2005 to 2017, to Ontario's environmental planning and protection regime, such with respect to the Conservation Authorities Act, the Clean Water Act, the Provincial Policy Statement, the Greenbelt, the Lake Simcoe Protection Plan, and other initiatives.

Amongst these other initiatives is A Place to Grow: Growth Plan for the Greater Golden Horseshoe. While having a growth plan is an important tool to address increasing population and development, as well as infrastructure and other needs, it has become overly influential in bad planning policy and decision-making, over-riding the need to protect natural landscapes and water quality, among other impacts.

As a result, we ask you to consider ways to assure conformity not only with the Growth Plan but with other key fundamentals to Ontario's future environment, social wellbeing, and economic vitality. We ask you to:

- 1.) Ensure conformity in future land use planning to the following section of the Provincial Policy Statement:
 - 2.2 *Water*
 - 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.....*
- 2.) Ensure that local Land Need Assessments require a watershed or sub-watershed plan to be considered complete, ready for public comment, and to be presented for ratification by Council; and,
- 3.) Recognize that most downstream areas of many of South-central Ontario's watersheds have been intensively developed, creating poor ecological conditions that include reduced and fragmented natural habitat as well as poor water quality and leaving headwater areas as de facto reservoirs of regional forests, wetlands, wildlife, and water quality & quantity. As a result, we ask you to consider special protection for your headwaters areas, as development based on past protocols will probably be inadequate to prevent serious negative cumulative impact to the whole watershed.

Please feel free to contact me at your convenience for further discussion.

Sincerely,

Andrew McCammon

Executive Director