

October 20, 2021

RE: York Regional Council Special Meeting, October 21, 2021

Further to our correspondence of June 23 on the Municipal Comprehensive Review as attached, the Ontario Headwaters Institute perceives the Region's efforts with respect to the proposed growth plan as untethered to any serious efforts to pursue a lens for sustainable land use planning.

We appreciate the complexity of land use planning decisions and highly admire the work of municipal planners. However, we perceive that current planning efforts are being driven by past direction and not by either a fulsome approach to regional priorities for ecological goods and services nor any sense of the global challenge of climate change.

While we endorse issues flagged by our sister organization, such as concerns about the York Sewage Solution and the impact of expensive infrastructure on the tax base, our concerns include:

- A land needs assessment that is not balanced by assessments for natural heritage, water, nor the need to maintain local agricultural capacity. We believe this review does not address capture the requirements to protect these features under York Region Official Plan 2010, particularly with respect to watersheds and Lake Simcoe.

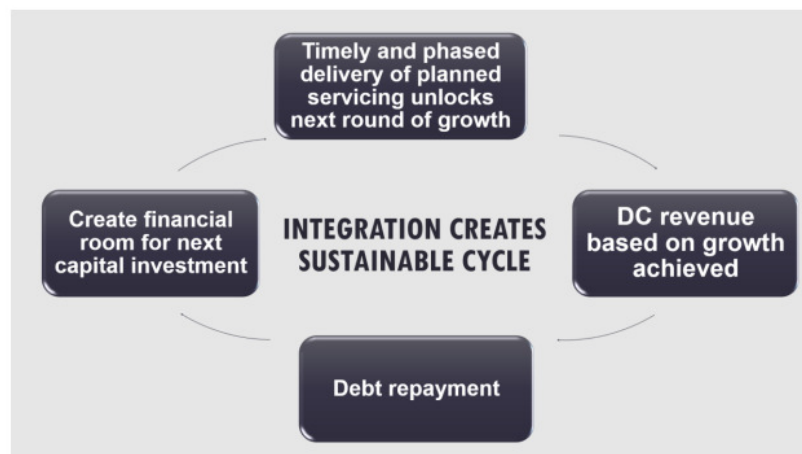
The Region must balance Land Needs Assessments with a suite of natural heritage studies, not to 2051 but to 2101;

- Rampant proposals for urban boundary expansion. We suggest that the Region establish high-level protocols to protect agricultural lands and natural heritage areas, perhaps guided by *How Much Habitat is Enough*. We also note the byzantine declarations of various municipalities to talk about how much land they've declared as environmental lands, without mentioning the fact that this was natural heritage to begin with and how much of such land, and its ecological goods and services, have been converted to urban and industrial.

The Region should use the natural heritage studies referred to above to set hard natural heritage boundaries beyond which urban development would be severely prescribed;

- Over-confident financial assurances such as the chart below from page 3 of the October 13 memo from senior staff on the financial sustainability cycle, as below, completely ignores external pressures.

Figure 1: The financial sustainability cycle



What do you think will happen to food prices as the Columbia River basin and Ogallala aquifer offer even less flow in the near future than at present, especially once you seed York's agricultural lands to development? What would projected calamities in the stock market (Evergreen) and the energy sector do? The assurances are comforting, but lack real-world risk assessment.

The Region should direct staff to augment their financial projections with a more fulsome analysis of global risks

There are also higher-order reasons to doubt the merits of the Region's Growth Plan, including that:

- One of the municipalities in the region, Simcoe County, has recently tabled a Watershed Plan Equivalent. There is no definition in regulation for a Watershed Plan Equivalent, but ministry staff has clarified that a Watershed Plan Equivalent must be equivalent, and that partially equivalent is unacceptable. The Simcoe equivalent report has an extensive list of caveats and notations about the absence, limitations, and shortcomings of reports and data. Not. Even Close.

The Region should reject the current report and issue a directive that any such future attempt must be equivalent to a proper watershed plan;

- Several municipalities in the Region are issuing directives to staff about what staff reports on planning must recommend. This is bad for morale, appears to force planners to violate professional ethics, and is probably a violation of the municipal code.

The Region should launch an immediate investigation into this practice; and, of utmost importance to the OHI;

- We consider the Growth Plan directives attaching population targets for urban growth to 2051 to be similar to an illegal order to the military, as the directive does not take in to account the real impacts upon natural heritage, water, the need to protect agricultural lands, the climate crisis, and financial stability. We are deeply distressed that most politicians and municipalities are falling in line to execute the illegal order, while at the same time pursuing reduced intensification targets that in some instances will make mass transit, another requirement under the Official Plan, either unattainable or financially sustainable, as pledged by the graphic above.

The Region should respond to the directive for a Growth Plan to 2051 by adopting a Growth Plan to 2026 and identifying a rationale to table emerging plans in five year increments to 2051 that will maintain regional ecological integrity and local agriculture while establishing and implementing a sustainability lens for land use planning.

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

Sincerely,

Andrew McCammon

Executive Director

York Regional Council and others
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cc futureyork@york.ca



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