

**Attachment 1 – Town of Richmond Hill Comments  
on the Province’s draft ‘Made-in-Ontario’ Environment Plan**

**GENERAL COMMENTS**

The draft Environment Plan covers many focus areas, but addressing the Province’s long-term vision by way of including more direct actions can help strengthen the Plan.

The Town supports the Province’s commitment to helping communities and families prepare for climate change and continuing to reduce greenhouse gas (GHG) emissions beyond the significant reductions already achieved since the 2005 base year. While adaptation is essential for addressing local climate impacts, our responsibilities also include mitigating emissions that our communities generate.

To move forward on the Provincial climate change goal of a 30% emission reduction by 2030 (based on 2005 levels) the following opportunities can be considered:

- More robust commitments such as moving directly into analyzing pre-existing climate data and outlining actions to be taken,
- Continuing to clean Ontario’s energy grid,
- Funding and interest in transportation as it relates to climate change adaptation and mitigation,
- Including strategies on how urbanizing municipalities can support the Provincial climate change goal.

Further suggestions related to the Environment Plan include:

- Informing the progress of the environmental initiatives highlighted in the case studies
- Including recognition of a wider set of ecosystem services and the inherent benefit of natural systems beyond the recreational benefits
- Including actions to mitigate overland and riverine flooding

<b>Chapter and Subchapters</b>	<b>DETAILED COMMENTS/SUGGESTED EDITS</b>
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**“Our Province Today”**

<b>“The Challenge Ahead” (p.6)</b>	The Town recognizes the challenges ahead from climate change. In the last five years alone, the Town has experienced extreme weather in the form of ice storms, windstorms, heavy rainfalls, sporadic freeze-thaw cycles and extreme heat. These climate conditions place a strain on our infrastructure, programs and resources.
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	It is encouraging to see that climate change adaptation addressed in the Plan for critical areas of risk such as aging stormwater infrastructure. However, mitigation opportunities for sectors such as transportation can strengthen the Plan.
<b>“Doing our Part” (p. 7)</b>	<p>The Town recognizes the significant improvements to date on cleaning Ontario’s grid; however, opportunities still exist to meet or exceed standards of Provinces such as British Columbia, Manitoba or Quebec.</p> <p>For climate change, the Town recommends further detail on mitigation opportunities before focused consultations in 2019.</p>
<b>“Guiding Principles” (p.8)</b>	<p>Richmond Hill recognizes the municipal obligation for climate change adaptation and mitigation. To strengthen the Plan, specification on current Provincial legislation and enforcement could assist in identifying areas of opportunities.</p> <p>The Town also recognizes the critical role the Province should continue to provide:</p> <ul style="list-style-type: none"> <li>• Coordinating and centralizing the collection and distribution of climate data</li> <li>• Promoting education and awareness on resident responsibility for climate action</li> <li>• Supporting local municipalities in the implementation of climate action</li> </ul>
<b>Protecting our Air, Lakes and Rivers</b>	
<b>“Clean Air” (p. 9)</b>	<p>The Town suggests expanding and focusing discussions on key areas that are susceptible to urban heat island effect and smog alerts for clean air objectives. Some opportunities include:</p> <ul style="list-style-type: none"> <li>• Urban forestry expansion for its carbon sequestration benefits and reduction of urban heat island effect</li> <li>• Replicating case study successes across the Province to allow for similar outcomes and benefits</li> <li>• Revisiting an updated version of the “Drive Clean” program or an equivalent</li> <li>• Support for electrification or other fuel alternatives to diesel for trucks and trains</li> </ul>
<b>“Clean Water” (p. 11)</b>	As with other municipalities with considerable growth and development, road salt continues to be a concern with respect to Richmond Hill’s kettle lakes and headwater tributaries. Provincial collaboration with Conservation Authorities

	<p>(CAs) and municipalities to identify best management practices and feasible (i.e. cost-effective and safe) road salt alternatives is a welcome approach.</p> <p>The Town will also require stronger Provincial guidance on water conservation planning and improvements to household standards to encourage a positive uptake and response to green development standards that include water efficiency design features.</p> <p>In addition, the ‘Clean Water’ section of the Plan could expand on water issues beyond its current focus on drinking water quality and quantity.</p> <p><b>Continue to Protect and Identify Vulnerable Waterways and Inland Waters</b></p> <p>A suggestion to protect vulnerable waterways and inland waters across Ontario, in addition to the specified areas listed under the action item.</p> <p><b>Improve Municipal Wastewater and Stormwater Management &amp; Reporting</b></p> <p>The Town strongly agrees with the use of stormwater financing tools for investments in stormwater infrastructure.</p> <p>Stormwater and wastewater management suggestions from the Town include:</p> <ul style="list-style-type: none"> <li>• Further direction and guidance for urbanizing municipalities on implementing low impact development (LID) for stormwater management</li> <li>• More information on the audience targeted for better understanding stormwater and wastewater policies</li> <li>• Include stormwater and watershed plans as part of adaptation solutions to addressing high priority risks</li> <li>• Support municipalities through funding programs for real time monitoring, and reporting</li> <li>• Targeting inflow and infiltration in to waste water systems to combat overflow concerns and support wastewater and stormwater system modeling and life cycle management</li> </ul>
<p><b>Addressing Climate Change</b></p>	
<p><b>“Building Resilience: Helping Families and Communities Prepare”</b></p>	<p><b>In Reference to Graphs Depicting Ontario vs. Rest of Canada Emissions:</b></p> <p>Suggestion to split the GHG emission levels for <u>each</u> of Canada’s provinces and territories and/or show the true average for all of Canada which would include Ontario (as opposed to the “rest of Canada” which skews the average).</p>

**(p. 18)**

Revising the graph would enable the reader to understand Ontario's position relative to other jurisdictions or see how it compares to the national average.

**“Improve our understanding of how climate change will impact Ontario”**

The Town agrees that a Provincial impact assessment and vulnerability assessments for key sectors are a crucial step in identifying risks to infrastructure, economy, and the environment.

To encourage accurate and consistent decision-making by municipalities, it is important for the Province to:

- Provide the centralized data that will feed into municipal climate change planning
- Ensure information is not too high level, as it is useful at a local scale
- Provide a Provincial contact to aid those using the data in identifying solutions
- Work closely with municipal partners when completing the impact assessment
- Include detail on how climate science modeling data can be operationalized into implementation projects
- Clarify stormwater will be included as a key sector and suggestion to include City of Toronto's Basement Flooding Subsidy Protection Program as a case study
- Allow for climate change adaptation provision/standard to be considered for future growth servicing and recoverable through development charges
- Update stormwater guidelines to encourage LIDs as a climate solution

**Help Ontarians Understand the Impacts of Climate Change**

The Town agrees that education and awareness about the realities and local impacts from climate change are necessary for Ontarians to understand why and how they can reduce emissions. Residents need to know about the long-term risks and costs of climate change and how proper adaptation and mitigation measures for buildings and infrastructure can reduce those risks.

**“Update Government Policies and Build Partnerships to Improve Local Climate Resilience”**

In general, Richmond Hill supports the review of land use planning legislation and policies to update policy direction on climate resilience. Policies to support mitigation and adaptation benefits include (but are not limited to):

- Efficient, transit supportive land use patterns
- Sustainable buildings with renewable and/or energy and water efficient technology
- Use of green infrastructure (e.g. green roofs, low impact development landscaping, climate resilient tree species)
- Building resilience into critical municipal infrastructure
- Supporting compact, complete communities through continued implementation of the Lake Simcoe Protection Plan, Oak Ridges Moraine Conservation Plan, Greenbelt Plan, Niagara Escarpment Plan and Growth Plan for the Greater Golden Horseshoe

Richmond Hill recognizes that buildings and transportation are the highest emitting sectors and happen to be areas that both the Province and municipalities can influence through policy and regulatory frameworks. The following categories list comments and suggestions from the Town pertaining to both sectors:

### **Building Code**

Improvements to building code for adaptation, energy and water reduction will reduce municipal climate risks. However, it is important to conduct a cost-benefit analysis for updates, and ensure a number of options for new technical requirements since a single solution is unlikely to address all building types.

It is also important to address retrofitting of existing builds. The Town suggests incentivizing homeowners to retrofit sustainable design features. The Province could provide municipalities with a tool kit, recommendations, and/or funding to help start up incentive programs.

### **Transportation**

Seeing as Transportation is a high emitting sector, the Plan could provide detail on how to prioritize and accelerate investment in public and active transit, as well as address the growing need for low carbon vehicle uptake by public and electric vehicle fast charge network infrastructure.

Specific considerations for transportation include whether Provincial fleet emission reduction targets should be included in achieving the overall target, and specifying the existing (or future) plans to ensure funding for high priority infrastructure projects (i.e. flood prone GO Transit lines such as the Richmond Hill line).

<p><b>Continuing to do Our Share: Achieving the Paris Agreement Target (p. 21)</b></p>	<p>Richmond Hill supports setting achievable emission targets that align with Canada’s commitments under the Paris Agreement.</p> <p>Since climate change is a long-term problem requiring long-term solutions, the Town strongly suggests looking at long-term targets that align with Canada’s 80% reduction target by 2050. The typical lifespan for key infrastructure and buildings developed or upgraded now will go beyond the 2030 target year. It is essential to consider how resiliency can currently be built into these assets in order to mitigate and adapt to changing conditions that will exist throughout their lifecycle.</p> <p>Suggestion to build on provincial plans such as the Growth Plan for the Greater Golden Horseshoe (2017) that includes a statement on consideration for addressing climate change.</p> <p>Municipalities can help support the Province in significantly reducing carbon emissions in the largest emitting sectors. This can be achieved through:</p> <ul style="list-style-type: none"> <li>• Promoting green development standards and energy conservation programs</li> <li>• Supporting sustainable transportation via development patterns and infrastructure</li> <li>• Supporting private sector innovation and expertise in the low carbon economy</li> </ul>
<p><b>“Make Polluters Accountable” (p. 25)</b></p>	<p><b>“Implement Emission Performance Standards for Large Emitters”</b></p> <p>The emission performance standards are a tool for reductions on a per unit basis, however total output for GHG emissions could still increase with growing demand overall. Suggestion to consult with stakeholders to develop a combined set of standards that reduce per unit emissions up to a maximum overall threshold for particular industries. Revenue from any fees or fines associated with these standards should be directed towards the development of cleaner technology and processes.</p>
<p><b>“Activate the Private Sector” (p. 27)</b></p>	<p>The Town supports the inclusion of municipalities among sectors eligible for the Ontario Carbon Trust fund. Investment in local, municipal-owned facilities with clean technology and infrastructure immediately benefits communities and taxpayers.</p> <p>Richmond Hill has one of the most educated labour forces in Ontario, and supports the Province’s desire to develop as leaders in clean technology and</p>

	<p>experience growth in jobs and the low-carbon economy to encourage private investments in Ontario.</p>
<p><b>“Use Energy and Resources Wisely”</b>  (p. 31)</p>	<p>By supporting municipalities in efforts to develop community energy plans and tools, public agencies and other stakeholders can maximize opportunities to encourage community-based energy systems, smart grids and energy storage through the planning and development system.</p> <p>The following sections include comments specifically tied to energy and resource conservation for GHG emitting sectors:</p> <p><b>Buildings:</b></p> <p>Richmond Hill encourages collaboration between municipalities and utilities for long-term energy planning and conservation to allow for a more streamlined approach to information sharing, education and outreach, as well as policy alignment. Further suggestions related to energy conservation and buildings include:</p> <ul style="list-style-type: none"> <li>• Partnering with utilities to develop incentives for energy audits and conservation</li> <li>• Regulatory flexibility for tax policy options enabling municipalities to tie incentives and pay back mechanisms to property tax (e.g. home energy retrofit loan programs)</li> <li>• Informing municipalities on case studies for successful energy conservation programs and incentives</li> <li>• Completing cost-benefit analysis on building code updates</li> </ul> <p><b>Food &amp; Organic Waste:</b></p> <p>Richmond Hill suggests promoting capture of methane generated from food and organic waste at landfill sites as an alternative energy source for space heating.</p> <p><b>Outdoor Lighting:</b></p> <p>Richmond Hill has recently replaced its streetlights with LED lights equipped with smart control nodes that allow for dimming of the lights and for metering electricity consumption. Current regulations do not allow the use of these smart light controls for billing purposes. Streetlight billing is based on a flat rate charge</p>

	<p>for municipalities, which does not recognize the energy conservation achieved through dimming of the lights. The Town recommends that the Province support the billing of streetlights based on smart meters in order to promote conservation efforts, such as the dimming of lights to reduce consumption during certain times of the night.</p> <p><b>Transportation</b></p> <p>Transportation is a high emitting sector, and Richmond Hill recognizes the importance of considering support for electric vehicle infrastructure and sustainable transportation within the Plan. Suggestions to address transportation include:</p> <ul style="list-style-type: none"> <li>• Supporting public, active and sustainable modes of transportation (e.g. rebates for purchasing low carbon vehicles)</li> <li>• Continued investment for uptake of electric, hydrogen and natural gas fueling infrastructure</li> <li>• Expand on Provincial investment and funding approach for public transit infrastructure and service level improvements</li> <li>• Invest in local transit systems to minimize urban sprawl and demand for major transit infrastructure projects</li> <li>• Indicate funding opportunities to support Ontario’s cycling strategy</li> </ul>
<p><b>“Doing our Part: Government Leadership”</b> <b>(p. 35)</b></p>	<p>Richmond Hill supports the notion that climate change is a priority for all levels of government. Similar to the Province, Richmond Hill is developing its own climate change framework to outline our municipal obligations and priorities for adaptation and mitigation. Further, the Town is developing a community energy plan and supports the continuation of the Municipal Energy Plan program and other funding initiatives to help empower local communities to undertake climate action.</p> <p>Municipalities welcome opportunities for enhanced coordination and guidance from the Province on incorporating climate action into municipal decision-making. Examples of interest areas for guidance and funding include:</p> <ul style="list-style-type: none"> <li>• Green infrastructure support</li> <li>• Climate consideration for infrastructure renewal projects</li> <li>• Investments and efforts for continued growth of emerging low carbon technologies in Ontario’s clean tech sector</li> <li>• Partnering with local community groups and businesses for development of community energy plans to provide funding and increase awareness</li> </ul>

**Reducing Litter and Waste in Our Communities and Keeping Our Land and Soil Clean**

<p><b>“Reduce Litter and Waste”</b>  <b>(p. 40)</b></p>	<p>The Town of Richmond Hill supports the overarching waste management objectives, including diverting more organics from landfill, reducing waste with an emphasis on plastics and micro plastics, moving towards a producer responsibility model for the blue box program and standardizing the list of acceptable items in the recycling and organics programs.</p> <p>Richmond Hill also supports the implementation of Provincially lead and funded initiatives for litter reduction, recovery of resources from waste as long as the appropriate considerations and environmental controls are in place, and Provincial measures to secure sustainable end markets to minimize market instability in recyclable material sales.</p> <p>Although the plan includes the foundation to achieve the objectives listed above, there are sections that require further consideration by the Province as described below:</p> <p><b>“Reduce and divert food and organic waste from households and businesses”</b></p> <p>A landfill ban at the curb creates accountability challenges, however more information and funding on restrictions and enforcement programs (i.e. use of clear bags) is helpful. Further suggestions are to:</p> <ul style="list-style-type: none"> <li>• Standardize waste information throughout the Province for consistent messaging</li> <li>• Provide waste diversion funding for retrofitting existing multi-residential buildings</li> <li>• Increase waste diversion through programs targeted on the IC&amp;I sector</li> </ul> <p><b>“Reduce plastic waste”</b></p> <p>Recycling standards must consider the processing capabilities of current recycling facilities to avoid contamination of the recycling stream.</p> <p><b>“Increase opportunities for Ontarians to participate in waste reduction efforts”</b></p> <ul style="list-style-type: none"> <li>• Engage waste collection companies as key stakeholders to ensure consistency across the Province for the blue box program and expand the list of acceptable items</li> <li>• Implement the necessary measures to require businesses to participate in waste diversion programs and to ensure compliance</li> </ul>
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**“Make producers responsible for the waste generated from their products and packaging”**

Richmond Hill supports the concept of making Producers responsible for Blue Box materials, so they can design long-lasting, reusable, easily recyclable products and minimize their costs and use of raw materials. However to address the gaps in guiding principles and details, the plan must ensure:

- Accounting for current complexity of the integrated waste management system to encourage a seamless transition to Full Producer Responsibility (FPR)
- If municipalities choose to continue to collect Blue Box materials on behalf of Producers the contamination management process should reflect a shared accountability between residents, municipalities, and producers
- Continue to maintain environmental performance and efficiency of the waste management system
- A clear, legislated role for municipalities in waste collection & processing, with fair and transparent compensation and consideration for municipal assets
- The transition to FPR should include the true collection cost for processing of recyclables, including costs for recyclables in municipal garbage and organics streams
- Develop a dispute resolution mechanism administered by the Province and Resource Productivity and Recovery Authority to resolve municipal and producer conflict
- Recognize progress to date on transitioning to FPR for consistency with the Waste Free Ontario strategy and ensure a meaningful consultation process with municipalities to inform transition to FPR

**” Explore opportunities to recover the value of resources in waste”**

Suggestion to develop a clear connection between the resource recovery from waste and the energy and resource conservation section of the Plan.

**“Provide clear rules for compostable products and packaging”**

Compostable branded products and packaging present significant processing challenges for municipalities as these items typically do not break down within the required timeframe.

A better integration of these products and packaging are required in the circular economy and producers must work with municipalities to develop standards and

	requirements for acceptance in existing organic facilities. Producers, rather than taxpayers, should also fund end of life management of these items.
<b>“Clean Soil” (p. 44)</b>	Richmond Hill recognizes that the coordinated approval and enforcement of soil remediation and transport is a public health matter appropriately dealt with at the provincial level.
<b>Conserving Land and Green Space</b>	
<b>“Action Areas” (p. 47)</b>	<p><b>“Support conservation and environmental planning”</b></p> <p>Richmond Hill recognizes the valuable knowledge of watershed conditions and cost effective services provided by conservation authorities (CAs) and encourages continued support for CAs and their role in environmental management.</p> <p>For protection of Ontario’s vulnerable and sensitive natural areas, the Town recommends public ownership to ensure long-term management. The Town also suggests a detailed strategy of conservation for well-connected habitats and alignment with the International Aichi Biodiversity targets adopted by Canada.</p> <p>In addition, given that the Environmental Assessment process was updated in recent years, another review and update does not appear to be a priority.</p> <p><b>“Promote parks and increase recreational opportunities”</b></p> <p>Richmond Hill recommends exploring opportunities to support the expansion of municipal trail networks with consideration of active transit and avoiding trail development in sensitive natural areas</p> <p><b>“Sustainable Forest Management”</b></p> <p>The Town has noted a gap for the consideration of urban forestry and the environment services beyond carbon sequestration in the Plan. Suggestions related to sustainable forestry include:</p> <ul style="list-style-type: none"> <li>• Support of municipal urban forest management, and acknowledgement of services provided by urban forestry such as public health benefits, urban heat island reduction, and carbon mitigation</li> <li>• Actions to expand and improve the Province’s urban forest through partnerships with stewardship groups (i.e. evergreen, LEAF)</li> </ul>

	<p>Richmond Hill also supports continued protection of the Greenbelt, based on the value it provides through recreation, biodiversity, local agriculture, water absorption, flood remediation, wind protection, carbon storage and mitigating urban heat island effect.</p>
<p><b>Next Steps</b></p>	
<p><b>“Implementing our Plan”</b>  <b>(p. 52)</b></p>	<p>The Province is encouraged to move past development of high-level plans by defining specific actions related to the priority sectors and identifying how progress on initiatives will be monitored.</p>