

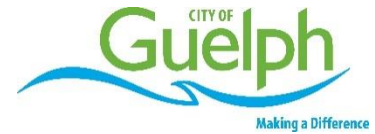
City Council Information Items

August 7, 2020

Items for information is a weekly publication for the public and members of City Council. Members of City Council may request that any item appearing on this publication be placed onto the next available Committee of the Whole meeting for discussion.

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Provincial and Federal Consultation Alert



2021 Federal Budget Consultations

Ministry

House of Commons Standing Committee on Finance

Consultation Deadline

7 August 2020

Summary

The House of Commons' Standing Committee on Finance is hosting pre-budget consultations in advance of the 2021 Budget. The Committee is particularly interested in measures the Federal government could take to restart the Canadian economy as it recovers from the COVID-19 pandemic.

Proposed Form of Input

The City should provide a written submission to the pre-budget consultation process.

Rationale

Preparing a written submission as part of the federal pre-budget consultation process will be important to advance the City's interests as the municipality and our local community recover, resume regular business under the 'new normal,' and prepare for future waves of the pandemic.

Lead

Intergovernmental Services

Link to Ministry Website

<https://www.ourcommons.ca/DocumentViewer/en/43-1/FINA/news-release/10797375>

Contact Information

Intergovernmental Services

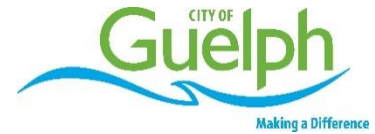
Chief Administrative Office

City Hall, 1 Carden Street, Guelph ON N1H 3A1

519-37-5602

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Provincial and Federal Consultation Alert



Proposed Changes to Environmental Approvals for Municipal Sewage Collection Works

Ministry

Ministry of Environment, Conservation and Parks (MECP)

Consultation Deadline

22 August 2020

Summary

MECP is proposing changes to the environmental approval process for low-risk municipal sewage works by implementing a Consolidated Linear Infrastructure Permissions Approach.

Proposed Form of Input

The City of Guelph will provide a submission on the Environmental Registry of Ontario.

Rationale

As a provider of municipal wastewater services the City of Guelph has an interest in providing input on proposals impacting sewage collection. Protecting the local environment for the benefit of the community is also a key priority for the City.

Lead

Engineering and Transportation Services & Environmental Services

Link to Ministry Website

<https://ero.ontario.ca/notice/019-1080>

Contact Information

Intergovernmental Services

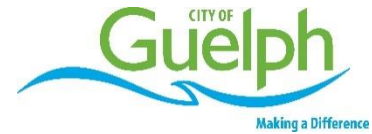
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Provincial and Federal Consultation Alert



Environmental assessment modernization: amendment proposals for Class Environmental Assessments

Ministry

Ministry of the Environment, Conservation and Parks

Consultation Deadline

August 22, 2020

Summary

This class environmental assessment establishes a planning and approval process for a variety of municipal infrastructure projects.

Class environmental assessment—proposed major amendment (2020)

Ontario is taking the next steps to update its almost 50-year-old environmental assessment program as committed to in its [Made-in-Ontario Environment Plan](#).

To support the government's modernization initiative, the Municipal Engineers Association (MEA) has proposed amendments to the Municipal Class EA. The proposed amendments would align assessment requirements with environmental impact, reduce duplication, and increase the efficiency of assessments.

The proposed amendments include:

- changing the project schedules for some projects to better align study requirements with the potential environmental impact of the project and reduce duplication, including:
 - exempting 28 project types that are considered to be low impact (e.g. modifications to traffic signals), where there is duplication with other processes, or the project types would be needed in cases of emergency
 - upgrading or downgrading assessment requirements for projects (e.g. shifting project schedules from B to C, or from C to B)
 - removing cost thresholds for road projects
- clarifying and modernizing current process requirements (e.g. removing the requirement to publish project notices in newspapers)
- updating the requirements for transit projects to be more consistent with *O. Reg. 231/08: Transit Projects* and Metrolinx Undertakings under the Act and proposing additional exemptions

Proposed Form of Input

Submit staff comments on the Environmental Registry of Ontario posting at the link below.

Rationale

The proposed amendment impacts a number of departments that undertake municipal class environmental assessments and an interdepartmental team response is appropriate for this review.

Lead

Arun Hindupur, Supervisor, Infrastructure Engineering

Link to Ministry Website

<https://www.ontario.ca/page/class-ea-municipal-infrastructure-projects>

Contact Information

Intergovernmental Services

Chief Administrative Office

City Hall, 1 Carden Street, Guelph ON N1H 3A1

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July 31, 2020

The Honourable Caroline Mulroney
Minister of Transportation
777 Bay Street, 5th Floor
Toronto, ON M7A 1Z8
minister.mto@ontario.ca

Dear Minister Mulroney,

Thank you for your government's leadership during these extraordinary times. On behalf of the City of Guelph and University of Guelph we are writing to draw your attention to continued financial challenges facing Guelph's public transit systems and the impacts on our riders and communities.

As you know, Transit is a critical service that enabled front-line health care workers to get to work, ensured manufacturing sector employees could keep the supply chain moving, and helped maintain access to groceries and pharmacies during the height of the pandemic. Now, as we enter phase 2, stage 3 of the recovery, we are looking ahead to the resumption of routine service and beginning to fully understand ridership and revenue impacts.

For many years, the University of Guelph student associations and Guelph Transit have had an agreement to provide a discounted transit pass (U Pass) to all University of Guelph students. This agreement allowed Guelph Transit to provide enhanced service to the University campus, and other student centric destinations in Guelph to facilitate public transit travel to jobs, off campus housing and entertainment.

On July 15, at the request of the University of Guelph student associations, Guelph Council made the difficult decision to approve the request to suspend the U Pass agreement. As a result of the pandemic, far fewer students will be required to attend in-person classes and fewer students will be able to reside in U of G's on campus residences due to public health requirements. These are not short-term impacts, these are changes to our community that will continue to have impacts for at least the next several years.

During the crisis, most transit systems in Ontario opted to forego farebox revenues in order to maintain access while protecting the health of transit operators. Now, farebox revenues are beginning to restart, however ridership has not rebounded to anywhere near pre-pandemic levels. The City of Guelph has reported transit losses of \$3.4 M due to the pandemic, and now, as a result of the suspension of the U Pass, Guelph Transit is facing an additional \$4.7M in losses. As a direct result of these financial impacts, Guelph Transit has

had to cut services reducing the level of service, the frequency of scheduled trips, and its workforce. There are additional revenue losses due to decreased advertising and decreased charter contracts.

On behalf of the City of Guelph and the University of Guelph, we are asking the Province to recognize the longer-term impacts of COVID-19 on our transit system for both operators and users (such as university students, faculty and employees), and the importance of transit in connecting our communities.

While emergency relief funding to replace lost operating revenue and support for the procurement of personal protective equipment, cleaning agents and disinfectants is important, we must also discuss longer-term support for transit operations.

As you know, the City of Guelph has limited ability to take costs out of Transit budgets. In some cases, a reduction in services will be feasible, but nowhere near 80 per cent. There are fixed costs to providing even reduced services, and these will be unsustainable.

We would welcome a phone call with you at your earliest opportunity to discuss these matters. To confirm your availability, please have your office contact scott.stewart@queph.ca.

Guelph is thankful for your leadership at this time. We are committed to continuing to slow the spread of COVID-19 in our communities and facilitate strong economic recovery in partnership with you and your government.

Sincerely,



Scott Stewart, Chief Administrative Officer
City of Guelph
T 519-822-1260 x 2221
E Scott.Stewart@queph.ca



Daniel Atlin, Vice-President, External
University of Guelph
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E Datlin@uoguelph.ca

cc: The Hon. Steve Clark, Minister of Municipal Affairs and Housing
The Hon. Ross Romano, Minister of Colleges and Universities
The Hon. Rod Phillips, Minister of Finance
Ontario Public Transit Association
Canadian Urban Transit Association
Association of Municipalities of Ontario

Written Submission for the Pre-Budget
Consultations in Advance of the Upcoming
Federal Budget

By: The City of Guelph

List of Recommendations:

Recommendation 1: To support local economic recovery and protect municipal services, the federal government should prioritize funding for Phase II of the Safe Restart Agreement in the upcoming federal budget.

Recommendation 2: Stimulate local economic recovery by investing in critical municipal infrastructure and by increasing the total federal funding available through the Investing in Canada Infrastructure Program.

Recommendation 3: Enhance federal engagement and partnerships with the provinces and municipal governments to improve the sustainability of funding for critical services delivered by municipalities.

August 7, 2020

The Honourable Wayne Easter, P.C. M.P. for Malpeque
Chair of the House of Commons Standing Committee on Finance
House of Commons
Ottawa

Dear Mr. Easter,

I am pleased to submit the following comments to the House of Commons' Standing Committee on Finance on behalf of the City of Guelph (the City) as part of the federal pre-budget consultation process.

Like all municipalities across Canada, the City of Guelph was called upon to quickly respond to the COVID19 pandemic. To date, we have done what is necessary to keep Guelph healthy and keep its economy open for business. Throughout the pandemic, we provided essential frontline services to the public with enhanced cleaning and PPE protocols. We also delayed property tax payments, temporarily made public transit and parking free, converted our facilities into testing centres, installed Plexiglas barriers to protect employees and citizens, provided emergency supports to those experiencing homelessness and launched [Grow Back Better](#), our 10-point plan to ensure an inclusive and green recovery. Today, we have a thriving new outdoor Dining District, City Hall services and our Farmer's Market have reopened, and the people of Guelph can once again access many recreational amenities in the community.

Despite these successes as Guelph safely reopens, the impact of the pandemic on the City's finances have been notable. Unforeseen costs are up and our revenues losses are mounting. At the time of writing, the City's deficit is between \$10-13M with \$20M in total lost revenues and \$4M in unbudgeted costs related to the City's COVID19 response. While we have yet to receive funding from the Safe Restart Agreement, this federal and provincial initiative is welcome and should go far in supporting the City for the rest of 2020.

Additional support for municipal operating costs and hard-hit transit systems will be necessary following the 6-8 months the Safe Restart Agreement is intended to cover. Local communities will also need a well-designed economic stimulus package from the federal and provincial governments that prioritizes critical municipal infrastructure. Finally, municipalities like the City of Guelph would benefit from enhanced federal engagement with the sector and a longer-term partnership to ensure sustainability for the breadth of services offered by municipal governments, from transit to key services like social housing, public health and long term care.

Prioritize Relief for Municipal Operating Costs and Transit Systems

Under the Safe Restart Agreement, Ontario's municipal governments are expected to receive \$4B in funding from the federal and provincial governments. This emergency relief is expected to last until around the end of the federal government's current fiscal year and is welcome by the City. However, the negative financial impacts of COVID19 are expected to last beyond the 6-8 month mark. More support from the federal and provincial governments will be necessary, especially as it relates to operating costs and public transit. The absence of strong federal and provincial commitments to supports for municipal governments for the 2021/2022 federal and provincial fiscal year has created uncertainty for the City as it budgets for the 2021 municipal fiscal year.

In particular, Guelph Transit has seen a steep decline in revenues and increased costs since the start of the pandemic. Currently, ridership is at 56% of what it was this time last year and revenue losses for 2020 stand at around \$8M and climbing. The majority of this revenue loss comes from the cancellation of the City's UPASS agreement with the University of Guelph's student associations for the upcoming school year. This means that Guelph Transit remains vulnerable to continued declines in revenue throughout 2021 until in-person classes resume and ridership levels stabilize. Since many of Guelph Transit's operating costs are fixed regardless of revenues and ridership, the City of Guelph will need federal support in the upcoming budget to continue to provide the service.

Investing in municipal transit systems is a smart choice for the federal government as it aims to recover from the COVID19 pandemic and economic downturn. Locally, Guelph Transit keeps the community moving. Public transit is essential in getting people to their workplaces and connecting them to services available in the community.

Other municipal services will also need operating relief in the upcoming budget. Federal funding should support key services like child care, housing services, public health and long-term care.

Recommendation #1: To support local economic recovery and protect municipal services, the federal government should prioritize funding for Phase II of the Safe Restart Agreement in the upcoming federal budget.

Invest in Critical Municipal Infrastructure to Stimulate Local Economic Recovery

The Investing in Canada Infrastructure Program (ICIP) has taken on renewed importance as municipal governments work to recover from the current economic downturn. Investing in current and anticipated infrastructure needs is a key tool available to the federal government to stimulate local economic recovery. Funding for critical municipal infrastructure will keep Guelph working and growing when we need it the most.

The City welcomes the recently announced COVID19 Resilience Stream under the ICIP program. In particular, the City supports the Federal government's commitment to cover 80% of eligible project costs. Also welcome is the \$1.184B in funding that has been

allocated to communities in Ontario, recently enhanced flexibility under other ICIP streams, and the federal commitment to a quick approval process.

The City of Guelph has a list of priority, job-creating and shovel-worthy projects ready to nominate to the provincial and federal governments once the first intake is launched. We encourage the federal government to quickly finalize negotiations with the Government of Ontario. The City also recommends that the federal government continue to invest in critical municipal infrastructure to stimulate local economic recovery by increasing the total federal funding available through ICIP.

Recommendation #2: Stimulate local economic recovery by investing in critical municipal infrastructure and by increasing the total federal funding available through the Investing in Canada Infrastructure Program.

Renew Federal/Municipal Partnerships to Enhance Municipal Sustainability

One of the lessons of the COVID19 pandemic has been the need to address the gaps that have emerged as a consequence of the devolution of services and responsibilities from the federal government, to the provinces, to municipal governments. In Ontario, municipal governments have been hit especially hard by the pandemic because of the broad range of services they offer to the public, from long-term care, to emergency housing for those experiencing homelessness, to public health, public transit, employment supports, childcare and more. These services are essential but they require collaboration and partnership between all orders of government to ensure their successful delivery. The pandemic has revealed that how these critical services are funded in local communities is precarious and unsustainable. There is a need for federal leadership.

As the federal government develops the upcoming budget it must consider the need to enhance engagement with municipalities like the City of Guelph in light of the critical role modern cities play providing essential services across the country. A renewed partnership between the federal government, the provinces and municipal governments will be critical as we work together to recover from COVID19 and the economic downturn.

Recommendation #3: Enhance federal engagement and partnerships with the provinces and municipal governments to improve the sustainability of funding for critical services delivered by municipalities.

Thank you for considering these comments from the City of Guelph. Leslie Muñoz, Manager, Policy and Intergovernmental Relations, at the City of Guelph, is available to answer any questions or comments you might have at leslie.munoz@guelph.ca.

Recovering from the COVID19 pandemic will require unprecedented levels of collaboration between the three orders of government. The City of Guelph looks forward to continuing to work with the Government of Canada and the province of Ontario to ensure a speedy recovery for our community.

Sincerely,



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CC Minister of Finance the Honourable Bill Morneau;
Minister of Infrastructure and Communities the Honourable Catherine McKenna;
MP Lloyd Longfield, Member of Parliament for Guelph;
Trevor Lee, Deputy Chief Administrative Officer, Corporate Services, City of Guelph;
Kealy Dedman, Deputy Chief Administrative Officer, Infrastructure, Development and Enterprise, City of Guelph;
Colleen Clack, Deputy Chief Administrative Officer, Public Services, City of Guelph;
Jodie Sales, General Manager, Strategy, Innovation and Intergovernmental Services;
Carole Saab, Chief Executive Officer, Federation of Canadian Municipalities

Wednesday, July 29, 2020

Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing 777 Bay Street
23rd Floor, Suite 2304
Toronto, ON M7A 2J3

RE: A Place to Grow Amendment 1 – Comments from the City of Guelph

The following comments are provided by the City of Guelph with respect to ERO Number 019-1680 **Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe** and ERO Number 019-1679 **Proposed Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe**.

Population and Employment Forecasts

The proposed amendment 1 contains low, reference and high forecasts with a planning horizon of 2051. The technical report prepared by Hemson titled "Greater Golden Horseshoe: Growth Forecasts to 2051" dated June 16, 2020 provides detailed forecast results for each upper and single tier municipality.

The report notes that no land supply constraints have been identified and that no environmental constraints on growth have been identified or assumed except for Dufferin County. Since the inception of the initial Growth Plan, the City of Guelph has provided comment and been in discussion with the Ministry to ensure that considerations for the City's water and wastewater servicing are taken into account as constraining factors in the establishment of forecasts and accommodating growth. The City requests that these constraints be addressed in the allocation of growth.

The reference or low scenarios as set out in the report project that the City will maintain a steady, consistent rate of growth over the forecast period. Until the MCR is completed, we cannot be certain that there is sufficient land supply or servicing available to accommodate the forecast to 2051. In terms of land supply, growth is limited by the City's current boundaries and future annexation scenarios would be limited by the extent of the provincial natural heritage and agricultural systems.

Our primary concern is with respect to the sustainability of local water resources to service the future growth proposed by the province. Guelph is a single-tier municipality, reliant primarily on groundwater as a water supply source. As such, Guelph is somewhat limited in its ability to increase municipal water supply. Increasing water supply for growth beyond that which can be supported by the local water resources will result in significant environmental impacts and potentially

adverse impacts. The Province's growth targets must consider the limits of a sustainable water supply.

In reviewing the Hemson report, it is not apparent that Hemson has considered the unique situation of Guelph with respect to its water supply. In 2017, Guelph, under the requirements of the Clean Water Act and in coordination with the Lake Erie Source Protection Authority (i.e., the Grand River Conservation Authority), had completed a Tier 3 Water Budget and Local Area Risk Assessment (<https://www.sourcewater.ca/en/source-protection-areas/Guelph-and-Guelph-Eramosa-Tier-3.aspx>). The Tier 3 Study identified Guelph as having a Significant Risk of not having sufficient water quantity to service its future water supply needs under drought conditions. The reference future demand period was 2031, although the City's 2014 Water Supply Master Plan, and through its water conservation and efficiency program, predicted a revised future demand equal to 2038. The Significant Risk designation is the result of the high water taking from groundwater aquifers in the relatively small footprint of the City's boundaries. The Tier 3 Study also identified a risk of significant baseflow reduction in a number of creeks and streams in Guelph and the surrounding area resulting from the future demand (i.e., 2038). The additional groundwater taking to meet the water demand in 2038 was predicted to reduce baseflow in a number of local creeks (i.e., Torrance Creek, Chilligo/Ellis Creek, Hanlon Creek, Blue Spring Creek and Irish Creek) by 14 to 41 percent. The results of the Tier 3 Study, with respect to surface water impacts, raise serious concerns regarding the potential sustainability of additional water takings within the City to support the growth forecasts to 2051.

We continue to have concerns that there is insufficient water supply capacity in the local area and that increased water taking to support the 2051 growth forecasts is unsustainable. Studies to address the sustainability of the City's water supply and assessments of future demands resulting from population forecasts to 2041 are currently underway as part of the City's Water Supply Master Plan Update (WSMP Update). To adequately assess the 2051 water supply demand and the sustainability question, the City would need to undertake detailed investigations and computer modelling studies. The studies, which are currently in progress for the WSMP Update, would aid in determining if the proposed forecasted growth is feasible and estimate the potential significant environmental impacts that would occur as a result. The appropriate studies could take months to complete, therefore, it is not feasible to assess the sustainability of a 2051 water demand for the City prior to the APTG comments closing deadline.

The City also has concerns with respect to wastewater treatment requirements for growth beyond 2031. The City will need to consider the additional flow projections to accommodate growth through a study of the assimilative of the Speed River as part of our Wastewater Treatment Master Plan that is currently underway. There may be increased capital and operating and maintenance costs that would result from additional growth. Also, with the potential impact on the water servicing for the increased growth forecasts and potential short falls in water supply for the extended growth period (i.e. to 2051), this could impact the raw influent at the

Guelph Wastewater Treatment Plant (WWTP) and even flows in the Speed River. Increased water conservation to address water supply issues could result in more concentrated influent wastewater, if water usage is reduced or if increased water reuse is undertaken. If water servicing due to lack of water supply, includes any direct water usage from the Speed River or its tributaries, water taking from new wells or increased taking from existing wells, this could reduce the base flow in the Speed River at the WWTP and its ability to assimilate effluent flows from the WWTP. Water reuse could be increased beyond the current in-plant reuse and proposed sewer flushing uses, which could involve additional infrastructure or treatment levels at the WWTP. This would result in increased capital and operating and maintenance costs independent of or in addition to costs for increased servicing, which could increase the rate costs for users.

At this time, we are not able to definitively state that any of the forecasts for 2051 are appropriate for the City. Water Supply and Wastewater Treatment Master Plan updates that are currently underway will support the municipal comprehensive review and will provide the opportunity to assess the extended forecasts to determine, among other things, whether or not water and wastewater servicing continue to place limitations on Guelph's growth potential, and if they do, to what extent.

The City of Guelph, due to its reliance on groundwater and the assimilative capacity of the Speed River, must consider sustainability in planning for growth and it is important that the Growth Plan projections recognize this in the allocation of growth. At this time, the implications of growing beyond even the 2031 forecast on local water resources has not yet been fully understood, and the City of Guelph is not supportive of any future growth that would trigger the need to examine inordinately expensive regional or provincial servicing solutions.

Recommendation: The City cannot commit to a growth forecast until such time as it is determined that the local water resources can support the growth target(s). As such, the population and employment forecasts for the City of Guelph should be established as the low forecast set out in the Hemson Report and there should be allowance for the forecasts to be adjusted lower through the municipal comprehensive review should it be demonstrated that the forecasted growth cannot be serviced in an environmentally and fiscally sustainable manner.

Should the province choose to impose growth targets on the City that would require additional water takings either inside or outside of the City, the City would continue to advocate for the Province's prioritization of water resources permitting to support municipal growth needs under the permit to take water processes of the Ontario Water Resources Act.

In recognition of the City of Guelph's commitment to the environment, it is requested that the Province consider the constraints to servicing growth that may affect the planning and distribution of growth in Guelph to the horizon of the Growth Plan.

Growth Forecasts as Minimums

The proposed amendment states that municipalities would be required to use the selected growth outlook as the updated forecasts or use higher forecasts as determined through the municipal comprehensive review as part of this round of conformity exercises to meet the conformity deadline of July 2022. The amendment also states that the proposed forecasts in Schedule 3 would be applied at a minimum by upper- and single-tier municipalities through a municipal comprehensive review.

This proposed policy amendment creates uncertainty with long range planning for land supply and infrastructure and has implications on the regional approach to growth planning established in the Growth Plan. Since the forecasts are predicated on distributing growth, this scenario could create the potential for over-designation of land within certain municipalities and/or the GGH as a whole where municipalities choose to plan for a higher growth rate. This also creates potential for conflict during the MCR process as municipalities could be lobbied by landowners to include their lands within the horizon even if the forecasted growth would be exceeded. This approach is not fiscally or environmentally sustainable.

Recommendation: The City of Guelph is not supportive of the proposed direction for the forecasts to be applied as a minimum growth forecast. Policy 5.2.4.1 and 5.2.4.2 should not be amended to include the wording “or such higher forecasts as are established by the applicable upper- or single-tier municipality through its municipal comprehensive review”.

Planning Horizon of 2051

Another proposed change is an extension of the Plan horizon from 2041 to 2051 to ensure municipalities have sufficient land to support the fostering of complete communities, economic development, job creation and housing affordability. The new horizon is stated to be consistent with the long-range planning approach of previous growth plans and better aligns with the land supply requirements of the Provincial Policy Statement, 2020.

The City recognizes that the longer planning horizon provides greater consistency with the PPS, 2020 policies. However, the introduction of a new planning horizon at a time when municipalities are in the midst of preparing master plans and studies to support the municipal comprehensive review creates financial and resource challenges in terms of meeting the conformity deadline.

Recommendation: While the City of Guelph is not in agreement with the timing of the proposed change to the planning horizon while municipal comprehensive reviews are already underway, the City does not object to the proposed horizon year of 2051.

Conformity Timeframe

Under section 12 of the Places to Grow Act, 2005, the official plan of a municipality must be brought into conformity with a growth plan within three years of the growth plan coming into effect. Subsection 12 (3) gives the Minister the ability to set an alternate date for a municipality to meet the conformity requirements. The proposed approach is to retain the current date for conformity as July 1, 2022 for APTG as amended.

We request that consideration be given to extending the timeframe for conformity to July 1, 2023 at a minimum or three years from the date of approval of Amendment 1. The Growth Plan and Land Needs Assessment have changed significantly since the conformity date was set with the 2017 Growth Plan. With Amendment 1 being released for comment in June 2020 and uncertainty around the timing for finalization of the amendment, municipalities do not have certainty as to the planning horizon or forecast for the conformity exercises. A municipal comprehensive review involves significant community engagement and substantial work on master plans to inform it; all of this takes time and resources. Municipal resources are strained at this time due to COVID-19 response and we are not in a position to continue work that may have to be revised depending on the outcomes of the consultation on Amendment 1.

Recommendation: That the conformity deadline to be set by the Minister, for municipalities to bring official plans into conformity with APTG as revised by the Amendment, if approved, be set at July 1, 2023 (at a minimum) or 3 years from the date of approval of Amendment 1.

Land Needs Assessment Methodology

The proposed land needs assessment methodology (LNA) is a simplified approach that is intended to reduce the overall complexity of implementation of the Plan. The proposal states that the Methodology will provide more flexibility to municipalities. Our concern is that the proposed approach does not appropriately balance the desire for flexibility with the need for prescriptiveness and certainty in determining land needs.

The City of Guelph continues to be supportive of the current provincial methodology for land needs assessment (2018) in the Greater Golden Horseshoe. The methodology for land needs assessment allowed for a transparent and consistent approach for municipalities within the Greater Golden Horseshoe to assess the quantum of land needed to accommodate the forecasted growth to the horizon of the Growth Plan. The proposed simplified approach does not provide for this same level of consistency across the GGH. It also does not address data sources and does not provide guidance or criteria for addressing the housing market. The proposed increased flexibility is not helpful for working with stakeholders or achieving consensus and does not provide direction for alignment of land needs with other Growth Plan priorities.

Recommendation: That the detailed technical steps of the Land Needs Assessment methodology (2018) be retained and that criteria be developed for determining the market component of the LNA that considers and upholds local direction for long-term growth.

Other Considerations

Alignment with Provincial Policy Statement, 2020

The City of Guelph is supportive of the proposed amendments to provide consistency between the Provincial Policy Statement, 2020 and the Growth Plan.

Aggregate Mineral Resource Extraction

The proposed change to the Plan's aggregates policies would be more permissive of new aggregate operations, wayside pits, and quarries within the Natural Heritage System for the Growth Plan. Section 4.2.8 is proposed to be amended to delete the prohibition on establishing new mineral aggregate operations and new wayside pits and quarries, or any ancillary or accessory use thereto, in the habitat of endangered and threatened species within the Natural Heritage System for the Growth Plan.

While deleting this prohibition from the Plan does not absolve proponents from adhering to the requirements of the Endangered Species Act, 2007 (ESA), it has the potential to cause confusion regarding the applicability of the ESA and its approval process. This could lead to contraventions of the ESA and a reduction in the protection and recovery of species that are at risk and their habitats.

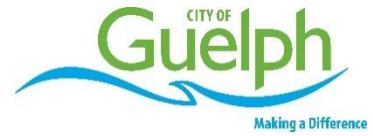
To avoid this unintended consequence, it is recommended that, rather than deleting the prohibition, Policy 4.2.8.2 a) ii be amended to be consistent with the Provincial Policy Statement, 2020:

"ii. habitat of endangered species and threatened species, except in accordance with provincial and federal requirements"

While the Growth Plan Natural Heritage System is not located within the City of Guelph, it is identified on lands adjacent to the City as are Mineral Aggregate Areas in the County of Wellington's Official Plan. Recognizing linkages between and among natural heritage features and areas, this recommendation would provide greater certainty for the protection of the City of Guelph's Natural Heritage System and associated ecological functions.

Recommendation: That Policy 4.2.8.2 a) ii be amended to be consistent with the Provincial Policy Statement, 2020:

"ii. habitat of endangered species and threatened species, except in accordance with provincial and federal requirements."



Thank you for the opportunity to provide comments on amendment 1 to the Growth Plan and the proposed land needs assessment methodology. Should you require clarification or wish to discuss these comments, please contact: Melissa Aldunate, Manager of Policy Planning and Urban Design; by email: melissa.aldunate@guelph.ca or by phone: 226-821-0434.

Sincerely,

Kealy Dedman, P. Eng, MPA
Deputy Chief Administrative Officer
Infrastructure, Development and Enterprise Services
519-822-1260 extension 2248
kealy.dedman@guelph.ca

Tuesday, August 18, 2020

HWIN Modernization
Program Management Branch – Program Oversight
40 St Clair Avenue West
4th Floor
Toronto, ON M4V 1M2
Canada

**RE: Discussion paper on modernizing hazardous waste reporting in Ontario
(ERO: 019-1760)**

The City of Guelph (the City) appreciates the opportunity to provide comments on the new digital reporting service for hazardous waste in Ontario. The City supports the transition from paper manifests to a new digital reporting service, and looks forward to working with the Ministry in future consultations and to provide feedback on the new digital system.

Automatic Emails

To improve digital tracking of hazardous waste by generators from the point at which it is generated to the point at which it is disposed, the Ministry should ensure that emails are automatically generated by the system. This will notify generators of any activity on their account, including when data is being added. This will allow generators to be aware of the movement of their materials.

Spills and Emergency Reporting

The digital reporting service should include a separate section for emergency situations, similar to the Spills Action Centre. This would allow for the creation of emergency generator registrations, including a series of questions to determine if emergency registration is required. During emergency situations, reporting must be available through paper and have offline capability.

Delegating Authority

The City encourages the Ministry to ensure safeguards are in place when delegating authority. Each party must be fully aware of their requirements when delegated authority to complete reporting requirements. This applies to both the generator and the organization/consultant that becomes the delegated authority.

Performance Measures

The City encourages the Ministry to track and provide the time and cost savings generated from transitioning the paper manifest system to the new digital reporting system. This tracking should relate to the goals of improving the existing service and knowledge base, increase ease of reporting subject waste, holding polluters

accountable, and to make necessary changes in the next phase of the project in 2022.

Tracking and Reporting

Generators should be provided continuous access to their online registration and reporting data to allow for information to be verified at disposal. Once the disposal is completed and data is verified, it can be archived from the reporting service. The generator should have the ability to store this as well, as required, for inspections.

Investigative Derived Waste (IDW) Exemption

The City is inquiring if the Ministry will consider exempting the HWIN registration requirement for investigative derived waste (IDW). O. Reg. 347 defines IDW as a potential industrial waste, which is not always a correct characterization of IDW (e.g. monitoring well development or purged water, which in many instances is not hazardous or characteristic waste). In many cases, IDW is slightly impacted groundwater (e.g. subsurface geotechnical-environmental investigations as part of the infrastructure design and construction projects and contaminated sites with low-level impacts).

Thank you for the opportunity to comment. We look forward to ongoing consultations with the Ministry on the wind-up of the MHSW program. Please do not hesitate to contact the undersigned if you have any questions regarding the City of Guelph's feedback.

Sincerely,

Jennifer Rose, General Manager

Environmental Services, **Infrastructure, Development and Enterprise**

Location: City of Guelph, 1 Carden Street, Guelph ON

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July 31, 2020

Alex Ruff, Member of Parliament
Bruce – Grey – Owen Sound
1102 2nd Avenue East, Suite 208
Owen Sound, ON N4K 2J1

Dear Mr. Ruff:

Re: Support for Private Member's Bill M-36 – Emancipation Day

At its Regular meeting held on July 27, 2020, the Council of the Corporation of the City of Owen Sound considered the above noted matter and passed Resolution No. R-200727-023 as follows:

R-200727-023

"THAT Owen Sound City Council acknowledges and supports the following Private Members Bill put forward by Majid Jowhari: M-36, Emancipation Day, 43rd Parliament, 1st Session that reads as follows:

"THAT the House recognizes that:

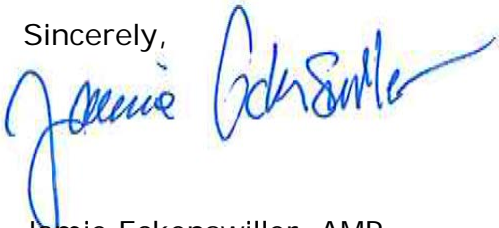
- a. The British Parliament abolished slavery in the British Empire as of August 1, 1834;**
- b. Slavery existed in the British North America prior to the abolition in 1834;**
- c. Abolitionists and others who struggled against slavery, including those who arrived in Upper and Lower Canada by the Underground Railroad, have historically celebrated August 1st as Emancipation;**
- d. The Government of Canada announced on January 30, 2018 that it would officially recognize the United Nations International Decade for people of African Descent to highlight the important contributions that people of African descent have made to Canadian society, and to provide a platform for confronting anti-Black racism;**
- e. The heritage of Canada's peoples of African descent and the contributions they have made and continue to make to Canada and in the opinion of the House, the Government should designate August 1 of every year as "Emancipation Day" in Canada."; and**

THAT support for this motion be sent to the Member of Parliament for Bruce-Grey-Owen Sound and all House of Commons representatives; and

THAT support for this motion be sent to all municipalities in Ontario."

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Jamie Eckenswiller, AMP
Deputy Clerk
City of Owen Sound

cc. All Members of the House of Commons
All Ontario Municipalities