



**ONTARIO  
RIVERS  
ALLIANCE**

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Flooding Reform  
Ministry of Natural Resources and Forestry  
2<sup>nd</sup> Floor South, 300 Water Street  
Peterborough, ON  
K9J 3C7  
By email: [MNRWaterPolicy@ontario.ca](mailto:MNRWaterPolicy@ontario.ca)

Re: Consultation: Improving the province's resilience to flooding

Dear Sirs:

The Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for several stewardships, organizations, private and Indigenous members who have come together to protect, conserve and restore riverine ecosystems.

The ORA is pleased to have the opportunity to comment on ways to improve Ontario's resilience to flooding and, by way of this submission, is responding to the consultation survey questions.

As a basic, the province must have a comprehensive approach to watershed management through flood mapping, mitigation and hazard planning and protection, including services such as wetland protection, climate change adaptation and resilience, biodiversity health and land use planning. In other words, we must be beefing up our public safety and environmental protection efforts, rather than gutting and streamlining key policy and legislation, as well as funding for our regulators.

Conservation Authorities (CA) must retain their mandate to manage flooding using a watershed approach; however, the province is proposing to limit their ability to effectively do their job. Bill 108 will make it more difficult to prevent flooding, protect drinking water sources, and help communities adapt and become resilient to climate change. Effective flood mitigation requires a watershed approach, and the CAs are well positioned to maintain that responsibility. The province must expand and fully fund CA flood management and climate adaptation and resilience programs.

Community disaster-ready capabilities must be assessed and readied, working together with regulators to share knowledge, practices and resources, and collaborate to find ways to become more climate resilient in the face of flooding, wildfires, or whatever disaster occurs.

The province must develop ways to help communities adapt, survive, and thrive in the face of any climate challenge. It must also invest in research to find innovative solutions to helping communities protect their homes and businesses from flooding and other natural disasters.

The best way to increase public awareness of how to avoid flooding and flood risks is to educate and familiarize them with flood/disaster management concepts. Engage communities in participatory risk assessments and preparedness measures for flooding. Familiarizing

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communities with flood/disaster management concepts would enable them to undertake such activities independently when needed. It would also help and inspire neighbouring flood-prone communities to develop capacities in similar ways.

Bring communities and agencies together to work in a coordinated way on adaptation and resilience to floods. Community Emergency Action Teams should be formed with the idea of fostering community capabilities and adaptability, so that short-term and long-term solutions can be developed, especially those that have experienced flooding in the past and are more apt to experience flooding in the future.

Land use and flood mitigation policies and practices must take into account our new reality of an increasingly hostile and changing climate. Resilience to climate change must ensure built and natural infrastructure can safely handle the extremes of flooding. Incentives should be offered to homeowners and industries that are already located within a flood plain area, to relocate their premises to a safe location. Some additional steps to be implemented include:

- The standard flood plain planning tool should take into account flood risk over 1,000+- years, rather than 100 years
- No residential or industrial development should be allowed within a flood zone
- All wetlands must be protected from development unless an environmental risk assessment has been completed and equal compensation provided. Wetlands act as a buffer and help to moderate flooding, clean the water and provide habitat.
- Green infrastructure should be required for any new development

To help ensure a timely clean-up and recovery from natural disasters, the provincial government should quickly make disaster relief funding available to affected homeowners and any Community Emergency Action Teams.

The main barrier to watershed management, land use and flood mitigation efforts is the continual erosion and deregulation of policies and legislation that were designed to protect communities and the environment - all in an attempt to make Ontario "Open for Business".

The government can improve disaster recovery programs by fully funding and supporting the existing regulatory bodies that have traditionally protected communities and natural resources, such as CAs, Ministry of Natural Resources and Forestry, and the Ministry of Environment, Conservation and Parks.

The recent proposed modernization of the CA Act and programs is the perfect example of irresponsible government deregulation and streamlining that increases the risks and makes communities more vulnerable to climate change. This is the absolute wrong thing to do at a time when widespread flooding and devastating wildfires are on the increase.

It is extremely important that this government take substantive action on disaster readiness to address the potential for increased flooding challenges in Ontario, both now and into the future.

Respectfully,

Linda Heron  
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