

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 349A/794
October 21, 2019

Planning Consultant
Provincial Planning Policy Branch
777 Bay Street, Floor 14
Toronto Ontario
M5G 2E5

Dear Sir or Madam:

Re: ERO 019-0279 Provincial Policy Statement Review

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest non-profit, conservation-based organization, representing 100,000 members, supporters, and subscribers, and 740 member clubs. We have reviewed the *Provincial Policy Statement Review – Proposed Policies* and submit the following comments for consideration.

The Provincial Policy Statement (PPS) provides important guidance on how significant natural heritage features must be protected. It is meant to prevent development in significant wetlands, woodlands, valleylands, wildlife habitat, fish habitat, and habitat of endangered and threatened species. The PPS also outlines how planning authorities must protect water quality and quantity. These are essential protections to conserve Ontario's biodiversity and maintain the climate resiliency of the province. In *Part IV: Vision for Ontario's Land Use Planning Systems*, the PPS acknowledges the importance of natural heritage and water resources to Ontario's environment, economy, and society. The OFAH is encouraged to see the government's recognition of the need to conserve biodiversity and ecological processes for the betterment of fishing and hunting opportunities. However, many of the proposed changes do not strengthen the protections and, in some cases, it appears that protections are being weakened. The OFAH is concerned about this, as the health of Ontario's fish and wildlife populations rely on strong habitat conservation policies.

In the 2014 version of the PPS, *intensification and redevelopment* and *settlement area* expansion had to be directed in accordance with Section 2: Wise Use and Management of Resources, which outlines development restrictions in significant fish and wildlife habitat areas. This direction is no longer in the proposed PPS which implies that development that falls under *intensification and redevelopment* or *settlement area* expansion could be considered in areas that have provincially significant ecosystems.

In addition to the above weakening of the PPS wording for natural heritage areas, the proposed PPS includes a new aggregate policy that states "Outside of the Greenbelt Area, extraction may be considered in the natural heritage features listed in section 2.1.5, 2.1.6 and 2.1.7, provided that the long-term rehabilitation can demonstrate no negative impacts on the natural features or their ecological functions." Any interruption in the natural heritage areas would have a negative impact on their features and their ecological function for the duration of the aggregate extraction. Also, even if rehabilitation took place, there is no guarantee that it would restore the ecological functions to the level that existed prior to extraction. This would result in a net loss of natural heritage areas during the lifetime of the aggregate extraction and perhaps permanently. What assurance would there be that aggregate proponents would be required to see their rehabilitation plans through and what monitoring would take place to assure the public that the natural heritage area was restored to its previous function?

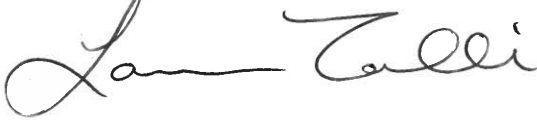
A reoccurring issue in the PPS is the use of the qualifier that development and site alternation could occur in natural heritage features if it is demonstrated that there are "no negative impacts." The Natural Heritage Reference Manual (NHRM) that outlines how the PPS is implemented states that the PPS definition of "negative impacts" does not "preclude the use of mitigation to prevent, modify or alleviate impacts to natural heritage features or areas." The OFAH is concerned about the implications of this, as modifying impacts to natural heritage features could still cause harm to those systems. Altering an ecological system in any way could be sufficient to alter species composition and ecosystem function, with no way to fully rehabilitate it to its previous state. It is our opinion that this is an inadequate definition of "no negative impacts."

The NHRM as a whole should be reviewed as it was written in 2010 to provide technical guidance for implementing the natural heritage policies of the 2005 PPS, making it almost a decade old and two editions behind the PPS. Additionally, the technical guidance documents that feed into the NHRM should also be re-evaluated to ensure that they reflect the best available science and information. The *Significant Wildlife Habitat Technical Guide* is now almost 20 years old and should be reviewed with the current understanding of Ontario's wildlife populations, especially with respect to how a changing climate will impact our wildlife species and their habitat needs.

The proposed PPS seeks to reduce barriers and red tape for development; however, the protection of ecosystems and significant natural heritage features should not be viewed as a barrier, but rather essential for the health of the province. The new policy even states that it will enhance direction to prepare for the impacts of a changing climate but weakens protections on the natural infrastructure that will mitigate those impacts. In a time when communities should be enhancing natural heritage features, the changes being proposed to the PPS are a step backwards. We agree with the government that "long-term prosperity, human and environmental health and social well-being should take precedence over short-term considerations" and we would hope that the proposed policies would better reflect this need for long-term thinking when maintaining and enhancing essential fish and wildlife habitat in the province.

Thank you for considering our comments.

Yours in Conservation,



Lauren Tonelli
Resource Management Specialist

LT/jb

cc: OFAH Board of Directors
Angelo Lombardo, OFAH Executive Director
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