



VISION • LEADERSHIP • GREAT COMMUNITIES

November 3, 2016

Ms. Terese McIntosh,  
Biodiversity and Wetlands Program  
Policy Advisor  
Ministry of Natural Resources and Forestry  
Policy Division, Natural Heritage Section  
300 Water Street  
Peterborough, ON K9J 8M5

**A Wetland Conservation Strategy for Ontario 2016-2030  
EBR Registry Number 012-7675**

Dear Ms. McIntosh:

On behalf of the Ontario Professional Planners Institute (OPPI), I am submitting the Institute's response with regards to the Province's "A Wetland Conservation Strategy for Ontario 2016-2030" (EBR Registry Number 012-7675).

OPPI is the recognized voice of the Province's planning profession. Our almost 4,500 members work in government, private practice, universities, and not-for-profit agencies in the fields of urban and rural development, community design, environmental planning, transportation, health, social services, heritage conservation, housing and economic development. Members meet quality practice requirements and are accountable to OPPI and the public to practice ethically and to abide by a Professional Code of Practice. Only Full Members are authorized by the *Ontario Professional Planners Institute Act, 1994*, to use the title "Registered Professional Planner" (or "RPP").

In preparing our response, we have read and reviewed the proposed Strategy and relied upon the OPPI submission regarding "Wetland Conservation in Ontario: A Discussion Paper" (EBR No. 012-4464). Our submission made on October 28, 2015 is attached for your reference and can be found online at <http://ontarioplanners.ca/getattachment/9f50ed0a-ccd8-466f-ab88-f6f6fb796dd5/Comments-on-Wetlands-Discussion-Paper.aspx>.

OPPI strongly supports the need for a comprehensive Wetland Conservation Strategy. We recognize that the statutes, regulations, guidelines, and policies need to be integrated and coordinated in a consistent and understandable framework. We understand the need and encourage the various Provincial ministries and Agencies to have a common purpose and to collaborate in implementing the wetland strategy and to take action together with municipalities and other agencies over the fifteen-year period.

We have reflected on paragraphs two and three within the Introduction and take seriously the intent of the Provincial government. This initiative by the Provincial government to "stop the net loss of wetlands", is imperative, provided that it recognizes the diversity of communities in

Ontario, the landowner, and First Nation rights and interests in wetlands. We support the proposed long-term strategy with the proviso that decision-making is transparent and the Province is accountable to the public.

The Vision, Guiding Principles and Strategic Directions are acceptable to OPPI, with the following comments:

In Principle 5, we support that the protection of Provincially Significant Wetlands (PSWs) is a priority for the Province. Municipalities and other agencies and authorities will be required to protect PSWs. Part of the same principle encourages the conservation of all wetlands. We are concerned that unevaluated and locally significant wetlands will not have the status of “protection” if there is only encouragement. We suggest that the principle of the conservation of non-PSW wetlands should be determined through the municipal planning policy process. This is particularly important in rural/agricultural areas of the Province.

Also, we note that although the rest of the document makes it clear, Great Lakes coastal wetlands are not PSWs and have protection status under Provincial Policy Statement 2014. This should be recognized in Principle 5.

The Targets indicated in Figure 3 and explained on Page 35 (Monitoring Success) and implicitly referenced on Page 39 (Policy Approaches and Tools) are a concern. The second Target is to halt, over the next 15 years, the net loss of wetlands where wetland loss has been greatest.

First, we do not see any reason to halt the net loss of wetlands only where the “loss has been greatest” in Ecoregions 6E and 7E (and in the document’s view, Ecoregion 5E). The document as a whole rightly stresses the protection of wetlands across the Province, and there is no justification in the document of a lesser standard north and west of Ecoregion 5E. Since northern Ontario development pressures are less and opportunities for appropriately using the policy tools on pages 38 and 39 are greater, there is no practical reason to limit the second Target to Ecoregion 5E and south.

In our view, the Target for the next 15 years should be net gain in the southern Ecoregions (5E, 6E and 7E), with a particular focus on PSWs, and no net loss in the North.

With regard to pages 30 and 39, in our previous submission, OPPI did not support compensation as an approach to protect PSWs, with the limited exceptions indicated in that submission. This remains the OPPI position. While the current document now points in this direction, we would like to see a much more explicit statement that PSWs and Great Lakes coastal wetlands will not be eligible for any offsetting programs under any circumstances, other than the previously suggested limited exceptions.

While, in principle, we are open to an offsetting program approach for other wetlands, it would be appropriate for the proposed research agenda on page 27 to include research into the value, effectiveness, and impacts of offsetting as a means to secure no net loss and net gain. Generally, offsetting remains unproven, and as a precaution, we would like to see this research completed, evaluated and made publicly available before the Province considers the implementation of an offsetting program policy.

We note that in the Glossary, the term “No Net Loss” is explained. Yet, there is no use of this term in the draft strategy. We suggest that this definition be replaced with an appropriate definition for “net loss” and for “net gain”. This definition in the Glossary is not satisfactory as the basis for a revised definition, as it relies solely on the “total area” as the indicator. This digresses from the indicator of wetland value that is clear in the Ontario Wetland Evaluation System (OWES).

The definition of “offsetting” in the “Fisheries Protection Policy Statement (DFO) states: “measures to counterbalance serious harm to fish by maintaining and improving fisheries productivity after all feasible measures to avoid and mitigate impacts have been undertaken”. A possible option would be to use The OWES (an actual evaluation of the “before” state compared with the pro forma of the “after” state), as the indicator for whether net loss is to be avoided or net gain achieved.

The four groups of Actions are certainly innovative and will provide clear guidance. Over the fifteen-year period, the strategy should state that the Provincial Ministries and agencies will commit to an adaptive approach to protecting and conserving Provincially significant wetlands and Great Lakes coastal wetlands.

On Page 25, under Awareness, point 11 should expand the use of the term “industry” by changing this to “public and private sectors”. In our previous submission, we consciously proposed that public infrastructure projects and environmental assessments should also be aware of the importance of protecting wetland features and functions.

OPPI continues to support the Provincial initiative to focus on Wetland Conservation in policy and practice. We welcome the opportunity to meet with you and staff to discuss our submission and to further explore these ideas and recommendations. To schedule a meeting or for further information, please contact me at 416-668-8469 or by email at [l.ryan@ontarioplanners.ca](mailto:l.ryan@ontarioplanners.ca).

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Ryan', followed by a horizontal line.

Loretta Ryan, RPP, CAE  
Director, Public Affairs  
Ontario Professional Planners Institute