



April 7, 2004

Mr. Chris Risley
Species at Risk Section
Ontario Parks
Ministry of Natural Resources
6th Floor, South Tower
300 Water Street
Peterborough, ON K9J 8M5

RE: RBR Registry Number: PB04E6008, Change the name of the existing “Vulnerable, Threatened, Endangered, Extirpated or Extinct Species in Ontario” list to the “Species at Risk in Ontario”.

Dear Mr. Risley:

Established in 1986, the Ontario Professional Planners Institute (OPPI) is the recognized voice of the Province's planning profession and provides vision and leadership on key planning issues. The Institute's 2,600 practicing planners are employed by government, private industry, agencies, and academic institutions. Members work in a variety of fields including urban and rural community development, urban design, environment, transportation, health and social services, housing and economic development.

The Institute supports the basic thrust of the policy proposal. We also support the working relationship the Ministry is forging with Federal officials responsible for the implementation of the Species at Risk Act. We recognise these changes are significant. The potential impacts on Planning Act decision making may be great. Careful attention needs to be placed upon implementation.

Ultimately, successful implementation will rely, in part, upon the interpretation and application of policies intended to protect species habitat through the application of the Provincial Policy Statement in municipal planning instruments and the sharing of information and advice. Threatened and endangered species will receive recognition under Section 2.3.1 a) of the natural heritage component of the Provincial Policy

Statement. *“Development and site alteration will not be permitted... in significant portions of the habitat of endangered and threatened species.”* Further, the Ministry encourages decision makers to provide protection to special concern, threatened and endangered species through the PPS policies affecting significant wildlife habitat.

Here are some recommendations intended to address implementation of these changes:

1) We recommend more attention be placed on information sharing where habitat information and incidence reporting is concerned. We endorse the activities of the Natural Heritage Information Centre but recommend that training and access to more sensitive information be expanded to professional biologists working for municipalities and consultants provided certification and agreements can be secured to ensure information isn't used for purposes other than those intended. We understand the Ministry has such programs in place for Ministry and Conservation Authority staff. We believe these programs should be expanded. If municipalities and others are expected to make good decisions, access to critical information and advice is required.

2) The Institute recognizes that some information needs to remain confidential if species and habitat are to be protected. But effective decision making requires collaboration and consultation. Provided guarantees are provided that the information will not be used inappropriately, it should be shared. We recommend a thorough public discussion of this topic in order to secure some consensus as to what arrangement is most satisfactory. Possibly these arrangements might form the basis of a specific Ministry policy.

3) The number of species addressed and the range of habitat considerations are wide ranging. Habitat mapping and recovery plans for individual species will be important documents to be considered in land use decision making. More guidance is needed as to how this information is to be used. For example, what is a planner to do where the recovery plan is in draft form and unavailable to the public? How are new species observations to be addressed in updating critical habitat mapping and recovery plans?

What is the role of the Environmental Registry in the approval of recovery plans? The Ministry needs to be more definitive as to its expectations of Planning Act decisions, where these background reporting requirements are concerned. Realistically, it may be many years before the necessary supporting mapping and recovery reports are developed and approved. How are these substantive matters to be addressed in the interim?

4) Finding out what species one may have on a site is easy. Determining what to do with that sighting subsequently may be profoundly more difficult. More guidance is required on what happens next.

We hope that these comments are of assistance. OPPI wishes you well in your efforts to address this important planning policy. If you have any questions, please contact Loretta Ryan, Manager, Policy & Communications at 416-483-1873 ext. 26.

Yours truly,

A handwritten signature in black ink, appearing to read "Jeff Celentano". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeff Celentano, MCIP, RPP

Chair
Policy Development Committee
Ontario Professional Planners Institute