



# The Ontario Headwaters Institute

February 12, 2016

Glenn Murray  
Ontario Minister of the Environment and Climate Change  
PDF via e-mail to minister.MOECC@ontario.ca

RE: Suggesting Targets under the Great Lakes Protection Act

Dear Minister Murray,

The OHI looks forward to the on-going implementation of the Great Lakes Protection Act.

In particular, we seek to support its implementation by suggesting a series of integrated, high-level targets under the Act.

As no method has yet been established by which targets can be suggested, we write you at this time, as suggested by staff in your ministry's Great Lakes Office, in the hope that you will support the targets suggested below and either seek to implement them or forward them to the Council, as may evolve, for their earliest consideration.

Our suggestion is that Ontario develop and embrace targets similar to or exceeding those in the federal publication "How Much Habitat is Enough".

The targets in the document suggest that a healthy watershed is one with:

1. A minimum 50% target for natural cover for each watershed, in order to maintain a low-risk threshold for healthy aquatic systems and species diversity;  
*Note: In selected areas of the Great Lakes Basin, Ontario might be required, due to existing or future development, to establish a 40% target as a medium-risk threshold or a 30% target as a high-risk threshold, as outlined in How Much Habitat is Enough. In those areas, Ontario should balance the higher-risk watershed targets with enhanced protective measures such as increased stewardship, land acquisition, biodiversity-monitoring, and/or regeneration programs.*
2. Wetland targets consisting at a minimum of the greater of (a) 10% of each major watershed and 6% of each sub-watershed, or (b) 40% of the watershed's historic wetlands; and,  
*Note: In areas where these targets have already been pre-empted by past development, restoration efforts to achieve or approach the targets should be implemented.*

3. Both sides of streams having a minimum 30-metre-wide naturally-vegetated riparian area to provide for and protect aquatic habitat.

*Note: We accept that many already-developed urban areas will be unable to achieve the target and concede that its implementation may be impossible in these areas, but seek its implementation in areas of emerging urban development. Similarly, areas with intensive rural development may present varying challenges to preserve or restore a 30-metre riparian buffer. As with item 1 above, we suggest that riparian restoration can be pursued to varying regional goals and can be expedited through creative fiscal initiatives with farmers and other rural landowners.*

These suggested targets would:

- Protect aquatic systems, natural heritage, and the ecological services provided by watersheds across Ontario's portion of the Great Lakes Basin;
- Contribute to the cumulative health of the Basin, thus enhancing the long-term public health, social stability, and economic vitality of present and future generations of Ontarian; and,
- Establish consistent targets across multiple jurisdictions, including conservation authorities and other planning authorities across the Basin.

We urge Ontario to adopt such targets, and suggest that the most natural, practical, and effective manner to do so is under the Great Lakes Protection Act.

Please let us know how you will address our suggested targets, as well as how we can assist you in their further consideration.

Sincerely,

*Andrew McCammon*  
Executive Director

cc MOECC Great Lakes Office