



The Ontario Headwaters Institute

October 4, 2017

Ala Boyd
Manager Natural Heritage Section, Policy Division, Ministry of Natural Resources and Forestry
PDF via e-mail

RE: EBR 013-1014: Proposed Regional Natural Heritage System or the Greater Golden Horseshoe

Dear Ms Boyd,

We offer the following comments on the proposed Natural Heritage System (NHS) for the Greater Golden Horseshoe (GGH).

1. The NHS Represents Progress: The mapping of a natural heritage system represents a priority outcome as recommended by the Crombie Panel and subsequent commitments from the Province under the Four Plan Review, and we commend the Province for this excellent initiative to protect our region's natural heritage and the ecological goods and services they provide.
2. Over-arching Provincial Commitment to Natural Heritage is Still Lagging: While an excellent initiative, and while the posting on the ER mentions How Much Habitat is Enough (HMH), the OHI continues to strongly suggest that the Province set targets in categories similar to those in HMH for the whole province. This is extremely important, especially for areas for which aggressive growth is expected, such as the north shore of Lake Superior and its watersheds, which are already the weakest-ranked aspects of its health, and as we move forward to a changed climate and a growing number of all types of species.
3. Natural Heritage is not equal to a Natural Heritage System: We find the absence of a description of Natural Heritage, and the benefits such provides to our environmental, economic, and social well-being, somewhat disturbing. A natural heritage system is a human construct, and it will prove inadequate if it does not protect enough natural heritage for future generations. MNRF has many useful expressions to describe natural heritage: both historically from past reports such as that beginning on page 169 of the 2001 Proceedings of the Parks Research Forum of Ontario (see <http://casiopa.mediamouse.ca/wp-content/uploads/2010/05/PRFO-2001-Proceedings.pdf>) to more recent descriptions of ecological goods and services. We believe this document and its intended mapping of a Natural Heritage System would be well-served if it oriented people to natural heritage, ecological integrity, and ecological goods and services before it began to suggest that a Natural Heritage System will save us from ourselves.
4. The Document Conflates several Important Concepts: While an excellent draft, we urge clarification on several important concepts that appear to be obtuse and/or that over-lap, as follow.
 - 4.1 When is a system not a system? The last sentence of the Summary on page ii (references in this submission are to the 62-page Technical Report) states "This report provides a detailed technical overview of the criteria, rationale and methods used to develop the proposed Natural Heritage System for the Growth Plan area." We note that this does not state what the "system" is, but alludes to the fact that this report will be used to create

the system. We consider that the word “system” lacks clarity in its three uses, and suggest that MNRF provide a more precise distinction between:

- the mapping system;
- its use and subsequent possible amendment by planning authorities to re-fine the mapping as it may be developed, used, and/or amended locally; and,
- as described in item 5 below, the process under which development may proceed and where and how mapping and “decisions” can be challenged.

4.2 Natural heritage appears to be conflated with agriculture Text also on page ii states that “Twenty-eight percent of the Prime Agricultural Areas identified in the proposed Agricultural System for the Growth Plan area occur within the proposed Natural Heritage System.” While the OHI has the greatest respect for agriculture, agricultural lands do not provide anything near the degree of natural heritage found in natural areas. We find it extremely important for the Province to be clear, from the outset and with respect to setting baselines for long-term monitoring, that any areas in agriculture should not be included in figures depicting lands in natural heritage. For example, the GGH might experience a long-term stasis of “land in natural heritage and agriculture”, when in fact lands in natural heritage might have shrunk significantly as they were converted to agriculture. The Province must have clear metrics distinguishing lands in natural heritage from lands in agriculture.

4.3 Natural heritage appears to be conflated with natural resources The document conflates natural heritage with natural resources, with various statements on the overlapping percentages of mapping for sand, gravel, and bedrock resources found in areas of natural heritage. As with agriculture above, reported land uses in natural heritage should be net of any uses for pits, quarries, and mines, and areas in use for these purposes should not be included in figures depicting lands in natural heritage.

5. Guiding Principles for Natural Heritage System Development As expressed in 4.1 above, we suggest the Province clarify what it means by “system”. In particular, we find the opening paragraph and the first two bullets of this section, beginning on page 4, potentially autocratic and immune to public engagement, as the system will be not subject to intuition; is to be well-documented with criteria, rationale, and methods clearly explained; and “decisions” – what and wherever they take place – will have been based on science and empirical evidence. Given such an allusion to omniscience, given that accurate mapping was a significant issue in the initial identification of the Greenbelt, and given any NHS mapping changes that may be made by local authorities as they re-fine the mapping, especially vis-à-vis proposed development, **we urge MNRF to create a properly resourced methodology and designated staff team to address challenges to the mapping and subsequent, un-defined “decisions”.**

6. As per an e-mail sent via a website petition, the OHI supports the position of Ontario Nature that the Province “Identify smaller core natural areas in highly fragmented landscapes. The minimum core size of 100 hectares must be reduced in areas with low natural cover as even smaller features can have high value biodiversity.”

We thank you for the opportunity to share our thoughts and urge the Province to clarify the issues we’ve raised.

Sincerely,

Andrew McCammon

Executive Director

cc Minister McGarry, Selected agency staff and NGOs, Environmental Commissioner of Ontario