

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Planning Consultation
Ministry of Municipal Affairs and Housing
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To Whom it May Concern:

Subject: ERO # 019-3233 Proposed changes to Minister's zoning orders and the Planning Act

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers, and supporters, and 725 member clubs. We have reviewed the proposed changes to Minister's zoning orders (MZOs) and the Planning Act, and offer the following comments for consideration.

The OFAH is deeply concerned with the proposed changes to exempt MZOs from being consistent with the Provincial Policy Statement (PPS). These changes have the potential to remove critically important natural heritage areas such as provincially significant wetlands, woodlands, and wildlife habitat. While the OFAH understands the government's desire to reduce barriers to development and more efficiently increase housing and employment opportunities, this should not come at the cost of sensitive and essential habitat. The areas protected under the PPS are critical habitat for Ontario's fish and wildlife. The protection of ecosystems and significant natural heritage features should not be viewed as a barrier, but rather as essential components of a healthy province. In a time when communities should be enhancing natural heritage features, the potential loss associated with this proposal are a major step backwards. Extreme weather events and flooding are increasing in frequency and severity. Natural areas, especially wetlands, play a crucial role in protecting people and infrastructure by mitigating the impacts of increased flooding.

In the *Made-in-Ontario Environment Plan*, this government indicated that they would improve the resilience of natural ecosystems through collaboration with partners to "conserve and restore natural ecosystems and ensure that climate change impacts are considered when developing plans for their protection." The plan also states that the Province will support conservation and environmental planning by "protect[ing] vulnerable or sensitive natural areas, such as wetlands," through "good policy" and "strong science." The proposed changes to the Planning Act contradict both commitments and many others in the plan.

Additionally, the *Wetland Conservation Strategy for Ontario 2017–2030* commits to halting wetland loss in high loss areas by 2025. However, by providing a fast track for development on provincially significant wetlands, it guarantees that goal of no-net-loss will not be met by 2025. Even if the Province developed an offsetting program similar to other jurisdictions, it would have to be extremely robust to ensure no-net-loss of wetlands. Furthermore, wetlands are not replaceable in a one-to-one way; depending on the wetland type, the required offset ratio can be up to 8:1 – that is, for every hectare of wetland removed, eight hectares of wetland must be created and fully functional before the wetland can be considered 'replaced.' Required offsets must be at such a high ratio to compensate for the risk of failures and reduced functionality. Offsets also take time to become fully functional, which results in the loss of wetland function between the time of removal and the time that the offset begins to function. In addition to high offset ratios, any offset policy would have to be accompanied by a monitoring and evaluation program to ensure that any offset is performing at or above the level of the impacted wetland. Without a system to adequately replace wetlands, we should not be removing any, particularly our most significant.

OFAH conservation programs work to protect and restore ecosystem services and habitat through invasive species early detection and rapid response, restoring Atlantic Salmon to our waterways, and farmer incentives to restore natural heritage features on their properties. If the Province does not continue to protect its most sensitive and important natural heritage features, the work accomplished through these and other conservation programs will be increasingly costly and futile. With the proposed changes, MZO's would be able to greenlight development in sensitive ecosystems that many organizations are attempting to improve and restore. Under the proposal, the removal of these areas would be allowed to go forward without any form of meaningful consultation or environmental consideration. This could completely remove subject matter experts from providing insight into the potential negative impacts associated with developing natural areas. It is critical that the Province consult area experts when making environmental changes to this degree, instead of streamlining development.

The creation of jobs and increased housing in Ontario are important, but do not need to come at the significant cost of irreplaceable critical habitats, natural heritage features, and invaluable ecological services. The proposed changes to the Planning Act are unnecessary for economic development and clearly contradict the Ontario governments *Made-In-Ontario Environment Plan*. The OFAH strongly recommends that the Province does not move forward with this change to the Planning Act as proposed. Thank you for considering our comments.

Yours in Conservation,



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