



February 29, 2019

Public Input Coordinator
Species Conservation Policy Branch
300 Water Street
Floor 5N
Peterborough ON K9J 3C7
Canada

RE: Ontario Endangered Species Act
10-Year Review Discussion Paper – Protecting and Recovering Species at Risk

Thank you for the opportunity to provide comments on the 10th Year Review of Ontario's Endangered Species Act Discussion Paper.

The Town supports the broader goals of the Endangered Species Act, in protecting species at risk and maintaining biodiversity in the province. However, there are areas of improvement for administration of the Endangered Species Act.

The development community in Wasaga Beach has experienced challenges with the efficiency of receiving comments from provincial agencies relating to development applications, creating delays in timing and uncertainty in economic development and investment opportunities.

Specifically, the Town has experienced challenges in processing development applications under the Planning Act and environmental assessments under the Environmental Assessment Act, relating to:

1. the extended length of time for provincial comments and technical advice;
2. untimely identification of species and/or habitat protection through development applications, that is often received at a point where a development application is well advanced in the planning process;
3. the uncertainty of the effects of species at risk 'general' habitat protection, particularly for the Eastern Hog-nosed Snake, Piping Plover, and Lake Sturgeon, on private development and public infrastructure and maintenance projects;
4. the uncertainty of how to effectively implement 'general' habitat protection vs. future habitat regulations for the variety of species at risk under the Endangered Species Act;
5. the precedence over the Planning Act, Environmental Assessment Act, and all other legislation afforded to the Endangered Species Act.

The Town recommends that the provincial administration be empowered with the resources to be engaged and effectively meet reasonable Planning Act and Environmental Assessment Act timelines in implementing the Endangered Species Act and regulations.

Additionally, particular beachfront neighbourhoods in Wasaga Beach have expressed concern with the lack of maintenance on significant portions of the beach due to nesting Piping Plovers dating back nearly 10 years. Once a pair of plovers has nested, the beach area within 400 meters of the nest cannot be maintained for 10 years. This has led to the portions of the beach being overgrown with vegetation. In a tourist town that relies on tourist visits to the beach as its main economic generator, this has created issues. Ontario Parks has done limited maintenance, but are constrained by the Act in how much maintenance they can do. There have been some recent pilots of limited maintenance in nesting areas that have shown the plovers still return to the area to nest. The review of the Act is an opportunity to revisit the limitations on habitat maintenance.

Please take these comments and concerns into consideration in the review of the Endangered Species Act.

Sincerely,

A handwritten signature in black ink, appearing to read "George Vadeboncoeur". The signature is written in a cursive style with a large initial "G".

George Vadeboncoeur

Chief Administrative Officer