

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Provincial Land Use Plans Branch
13th Floor, 777 Bay Street
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Subject: ERO# 019-6813 **Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument**

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 Provincial Planning Statement, 2023" and offer the following comments for consideration.

The OFAH is encouraged by the retention of many key environmental policies from within the PPS, including the Natural Heritage Features section. There are, however, several proposed changes that we feel require addressing.

Mission Statement

Throughout the document, there are several instances where important conservation themes have been removed from the text. "Biodiversity," in particular, was removed from the document's vision statement. Although we understand that this does not necessarily have regulatory implications, the exclusion of such a vital principle from the vision statement may send the wrong message; namely that conservation and preservation of biodiversity is not a priority. Considering the present global biodiversity crisis and Canada's, indeed Ontario's, role in this issue, such a message would be of significance. Our province represents a biological stronghold in a world experiencing progressive biodiversity loss, but that role is increasingly threatened (Finkelstein et al. 2023; OBC, 2015). It is vital that the province be explicit in their prioritization of biodiversity preservation and growth.

2.1 Planning for People and Homes

The New Provincial Planning Statement includes a provision that states, "Where the Minister of Municipal Affairs and Housing has made a zoning order, the resulting development potential shall be in addition to projected needs over the planning horizon established in the official plan." This policy may inadvertently result in more land being set aside by municipalities than is necessary, furthering the existing issue of urban sprawl across the natural and rural landscape. Seeing as current expansion projections are already a great threat to biodiversity, the OFAH would encourage the province to require municipalities to incorporate MZO's into their yearly growth projections.

2.3 Settlement Areas and Settlement Area Boundary Expansions

Of great concern is the elimination of Municipal Comprehensive Review requirements for development projects. MCRs were a critical tool of the Growth Plan which served to restrict urban sprawl. By removing any reference to these in the new PPS, the province is allowing municipalities to expand their boundaries at any time and for landowners to apply for expansion as often as they wish. This policy change will likely have serious implications for Ontario's biodiversity, especially in southern parts of the province where urban expansion already threatens the little remaining wetland, grassland, and forest habitats (OBC, 2015). We strongly advise against this free-reigning approach to boundary expansion.

4.2 Water

Another important change in the new Provincial Planning Statement is the elimination of the following requirements with respect to water: “c) evaluating and preparing for the impacts of a changing climate to water resource systems at the watershed level.” Although the PPS does make reference to climate change in other sections, other than with stormwater management, it does not explicitly require municipalities to prepare for the impacts of our changing climate on water. It is clear to the OFAH that omitting such a requirement would be a mistake. Water systems are among the most directly impacted natural systems by climate change (Owens, 2020; Pour et al. 2020; Wehner et al. 2017), and municipalities are often the best suited to understand the specific needs of their local environment. By eliminating consideration for this long-term threat, the province risks significant social, economic, and environmental impacts in the near future.

Similar changes occurred in “2.3: Settlement Areas and Settlement Area Boundary Expansions” and other sections of the document.

We recommend reinstating these requirements so as to prioritize the long-term viability/environmental and social health of newly developed landscapes.

7 Definitions

Finally, references to the “Ontario Ministry of Natural Resources and Forestry” have been replaced by “the Province” within the new definitions of “significant” wetlands, coastal wetlands, areas of natural and scientific interest and woodlands. As a result, the MNRF will no longer set criteria by which areas of ecological importance are evaluated. The MNRF specializes in ecological and natural resource health and science, they have hundreds of experts across Ontario who collectively possess a wealth of knowledge about our province’s complex ecological landscape on local and large scales and are almost certainly the best suited to create objective criteria for classifying habitat. We are very concerned that whichever provincial entity is now tasked with creating eligibility criteria for significant ecological features will do so from a less informed perspective than the MNRF, thereby threatening Ontario’s ecological health and compromising the integrity of the planning system, as a whole.

We hope the provincial government will consider our comments and suggestions in the interest of a sustainable and abundant future for Ontario. We look forward to any opportunity to work with the province on this topic.

Yours in Conservation,



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cc: OFAH Board of Directors
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References

- Council, Ontario Biodiversity. (2015). State of Ontario's Biodiversity. Ontario Biodiversity Council, Peterborough, Ontario. [Online]. <https://www.academia.edu/download/51573871/sobr-2015.pdf> Last accessed July 21, 2023
- Finkelsteina, Sarah A; Doherty, Cathal; & Loder, Amanda L. (2022). Safety Net Ontario: Ontario’s outsized role in the “Global Safety Net” for climate and biodiversity. *Facets* 8, 1-17. <https://doi.org/10.1139/facets-2022-0126>
- <https://ntrs.nasa.gov/citations/20180001310>
- Owens, Philip N. (2020). Soil erosion and sediment dynamics in the Anthropocene: a review of human impacts during a period of rapid global environmental change. *Journal of Soils and Sediments*, 20, 4115–4143. <https://doi.org/10.1007/s11368-020-02815-9>
- Pour, Sahar Hadi; Khairi Abd Wahab, Ahmad; Shahid, Shamsuddin; Asaduzzaman, Md; Dewan, Ashraf. (2020) Low impact development techniques to mitigate the impacts of climate-change-induced urban floods: Current trends, issues and challenges. *Sustainable Cities and Society*, 62, 102373. <https://doi.org/10.1016/j.scs.2020.102373>
- Wehner, M.F.; J.R. Arnold, T. Knutson, K.E. Kunkel; and A.N. LeGrande. (2017) Droughts, floods, and wildfires. In: *Climate Science Special Report: Fourth National Climate Assessment, Volume I* [Wuebbles, D.J., D.W. Fahey, K.A. Hibbard, D.J. Dokken, B.C. Stewart, and T.K. Maycock (eds.)]. U.S. Global Change Research Program, Washington, DC, USA. 231-256. <https://doi.org/10.7930/J0CJ8BNN>