



December 15, 2022

Attention:
Provincial Land Use Plans Branch
Ministry of Municipal Affairs and Housing
13th Floor, 777 Bay Street
Toronto, ON
M7A 2J3
growthplanning@ontario.ca

Dear Madam/Sir:

Subject: ERO Policy Proposal Posting 019-6177
Review of A *Place to Grow* and Provincial Policy Statements

Background

For over 80 years, DUC has been Canada's leader in wetland conservation. Using sound science, DUC works with landowners, government, public agencies, Indigenous groups, and many partners to protect, enhance and restore wetlands and associated habitats. In Ontario alone, DUC has conserved more than one million acres of vital habitat that contributes to Ontario's critical natural infrastructure that supports resiliency against flooding, improved water quality, increased biodiversity, species at risk recovery, and access to healthy outdoor spaces for people.

DUC understands the government's commitment to help enable an increased supply of housing for Ontarians. DUC sees the protection and restoration of wetlands as complementary to Ontario's land use planning priorities in the *Place to Grow* planning area, rather than as a barrier to increased housing supply.

Within the *Place to Grow* planning area, and in fact across Ontario, wetlands represent important ecological and economic values that play key roles in helping to ensure landscape level ecological health, provide wildlife habitat, contribute to water quality improvement, provide natural infrastructure that contributes to climate resiliency and offer important recreational and associated health related benefits. But as our research has shown, wetland loss continues within southern Ontario. Measures are needed to both halt this decline and enable a net gain in wetlands.

Recommendations

DUC believes that both *A Place to Grow* and the *Provincial Policy Statement* documents provide especially important policy direction to municipalities regarding wetlands protection.

The *Provincial Policy Statement* (Section 2 Wise Use of Natural Resources) has long been the provincial policy basis for the protection of evaluated wetlands in southern and northern Ontario within a broad

natural heritage systems approach, the consideration of the impacts of adjacent activities upon these wetlands, and the need to consider the benefits of natural infrastructure (Section 1.6 Infrastructure and Public Service Facilities).

A Place to Grow further supports wetlands protection by providing important policy direction regarding the need for watershed, sub-watershed, and storm water management planning before new land use development (Section 4.2.1 Water Resource Systems), the need to protect natural heritage systems (Section 4.2.2 Natural Heritage Systems) and encouragement for the municipal consideration of natural infrastructure to help address climate resiliency and adaptation (Section 4.2.10 Climate Change).

Recommendation #1: DUC recommends that if the province either amends the *Place to Grow* or *Provincial Policy Statement*, or combines them into one policy document, that the critically important wetland, natural heritage, and water resource related policies that support wetlands protection be maintained and not lessened or lost.

Experience and research have shown however that existing provincial land use planning policy for the protection and restoration of wetlands is not sufficient to halt the decline in wetlands across southern Ontario, nor to achieving much-needed net gain in wetland areas. Provincial policy requiring the protection of and assessment of impacts to wetlands is limited to only “significant” wetlands (commonly referred to a “provincially” significant), as determined by evaluation methods approved by the province. It is important to note that the protection of unevaluated wetlands fell to conservation authorities, but even then, only in regulated areas. This left a large area of wetland unprotected. With the passing of Bill 23 which restricts Conservation Authorities to regulating only in hazard lands, this challenge has been greatly magnified and a large number of wetlands in Ontario are left unprotected.

Recommendation #2: DUC recommends that provincial land use planning policy be amended to place equal value (ie significant) on all wetland habitats and require that before site alteration and/or development is considered for a wetland area, that a wetland evaluation needs to be completed by a qualified individual, consistent with the provincially approved evaluation methodology. In the absence of such an evaluation, these unevaluated wetlands continue to be at highest risk of loss to development.

Finally, Part II Legislative Authority of the *Provincial Policy Statements* provide that,

The policies of the Provincial Policy Statement represent minimum standards. Within the framework of the provincial policy-led planning system, planning authorities and decision-makers may go beyond these minimum standards to address matters of importance to a specific community...

Recommendation #3: DUC recommends that provincial land use planning policy be amended to more explicitly and specifically note that municipalities through their official plans can extend the protection of wetlands to all wetlands within their municipal boundaries in accordance with their planning objectives for natural system protection, enhancement/restoration, and climate adaptation.

Path Forward

DUC is committed to working with government, municipalities, conservation partners and other stakeholders to conserve our residual wetland base across the province of Ontario, and put more habitat back on the Ontario landscape, particularly in those areas of the province that are highly threatened and where we simply cannot afford to lose more than what has already been lost.

In so doing, we are open to help find win-win policy solutions that help the province deliver on its housing supply priorities, while ensuring the stated Ontario government commitment to net positive outcomes for wetlands and other natural heritage features and reverse the decades long trend of natural heritage loss.

Thank you for your consideration. We look forward to the opportunity of future engagement. If there are any questions regarding this DUC submission, Ministry staff may feel free to contact me directly.

Yours truly,

A handwritten signature in blue ink, appearing to read "Lynette Mader".

Lynette Mader
Manager of Provincial Operations – Ontario
Ducks Unlimited Canada
Tel: 1-705-242-7769
Email: l_mader@ducks.ca