



North  
Gwillimbury  
Forest Alliance

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Dear Ms. Chagani,

**RE: Natural Heritage System and Restoration Strategy for the Lake Simcoe Watershed**

Thank you very much for the opportunity to review the draft *Natural Heritage System and Restoration Strategy for the Lake Simcoe Watershed* (NHSRS). We, the undersigned organizations, are pleased to provide input on the proposed strategy.

Overall, we would like to congratulate the Lake Simcoe Region Conservation Authority (LSRCA) on its thorough, well-conceived approach to identifying the NHSRS. Particular strengths of the strategy include: the provision of specific targets for key features; the provision of a solid, science and policy-based rationale for the protection and restoration of key features, connecting corridors and buffers; the detailed presentation of the benefits of and threats to natural heritage; the inclusion of multiple maps and tables to illustrate with precision the approach taken; and the detailed implementation plan which includes both timelines and roles/responsibilities within the LSRCA.

These significant accomplishments notwithstanding, we have the following questions and concerns.

**1. Wetlands.** The NHSRS should refer to and be guided by Ontario's new wetland conservation strategy. In accordance with the provincial strategy, it should clearly state that Provincially Significant Wetlands (PSWs) will be off limits to development. The LSRCA should articulate a clear commitment to protecting PSWs, and demonstrate this in practice by immediately protecting the Paradise Beach-Island Grove Provincially Significant Wetland from proposed development. We note that this PSW and the North Gwillimbury Forest have been included in the NHSRS – the next step is for the LSRCA to protect them by denying the section 28 permit being sought by a developer. Not doing so would seriously compromise the credibility of the LSRCA's commitment to implementing the NHSRS.

Clarity on the protection of PSWs is particularly important given references throughout the document to ecological offsetting. We note that the LSRCA's *Ecological Offsetting Plan* (May 2017) does not specifically address PSWs. This is puzzling given that the offsetting plan does indicate that bogs, fens and rare vegetation communities would not be considered for offsetting (p. 7) - is the omission of PSWs deliberate?

In accordance with the provincial wetland conservation strategy and the 2014 Provincial Policy Statement, PSWs should be strictly off-limits to development and offsetting. For a thorough

review of wetland offsetting policies (Canada and the US), and the need to set limits, please see Ontario Nature's 2017 report, *Navigating the Swamp: lessons on wetland offsetting for Ontario*:

[https://www.ontarionature.org/discover/resources/PDFs/reports/wetlands\\_report\\_Final\\_Web.pdf](https://www.ontarionature.org/discover/resources/PDFs/reports/wetlands_report_Final_Web.pdf)

2. *Targets*. As noted above, we applaud the LSRCA for including specific targets in the strategy. The inclusion of an assessment of existing conditions and implementation potential is particularly exemplary (Tables 3, 5-1). Nevertheless, we have the following questions/concerns:

- i. It appears that the net gain target is based solely on offsetting ("Ecological Offsetting plan substantiates the net gain associated with any loss of features across the watershed"). This is inappropriate, considering that offsetting is a measure that should be used only as a last resort, in situations where avoidance and mitigation of negative impacts are not possible. Net gain for the strategy overall should be based on a solid plan for restoration that is not premised on losing existing features and then offsetting the harm.
- ii. The 15% target for wetlands is actually lower than the 17 percent of existing wetland in the watershed. This is inappropriate and out of line with the overall thrust of both the NHSRS and the provincial wetland conservation strategy. The target should be higher than what currently exists, especially given historic wetland loss as well as the numerous and invaluable ecological, social and economic benefits of wetlands outlined in the strategy (p. 30).
- iii. Regarding woodlands, the target for 200 ha forest patches is inappropriately vague: "multiple" can mean anything. The target should surpass or at least meet the existing condition (46%).
- iv. Also regarding woodlands, the 10% target for interior forest is less than the existing 12.5% of the watershed. This is inappropriate considering the significant ecological value of interior forest, as described in the strategy. The target should be to increase or at the very least maintain what currently exists. Strict protection measures should apply: interior forest should be explicitly off limits to development and offsetting.
- v. Bogs, fens and swamps are listed under both wetlands (at 135 ha, 433 ha and 41,511 ha respectively totalling 42,079 ha) and woodlands (at 135 ha, 152 ha and 44,164 ha totalling 44,451 ha). Are these areas being double-counted in the current area, conditions and targets in the NHSRS? As written, the strategy lacks clarity and perhaps accuracy in terms of how these features are distinguished and counted in wetlands and woodlands in the NHS.
- vi. Figure 4.12 on p. 53 of the NHSRS indicates that a total of only 281 hectares has been identified to strengthen the main corridors of the watershed. Table 3 (p. vi) likewise indicates that there is potential to add only 282 hectares of potential habitat through corridor restoration. Does this total include the corridors themselves, or just potential additions/opportunities? This area seems extremely small for such a large watershed. The NHSRS linkages should match those identified in the NHS for the Greater Golden Horseshoe. Corridors must be functional at different scales (site,

watershed and regional scale). There should be corridors intended to support connectivity at the broader landscape level and they should be a minimum width of two kilometres to allow for the movement of wildlife.

- vii. Regarding the Lake Simcoe shoreline, there is a mismatch between the target (30 metre protection zones) and the percentages given for existing conditions (25%) and the implementation potential (50%). While the 30 metre protection zone is a useful target, and should be kept, another target reflecting the percentage of the watershed to be captured in the NHS should also be included. This second target should be ambitious, considering potential water quality benefits, surpassing existing conditions and ideally approaching the potential increase of 50%.

3. *Broad definition of restoration.* The broad definition of ‘restoration’ which includes protection (pp. vi, 16) is problematic. It blurs the lines between protecting through policy that which exists and attempting to compensate for loss through enhancement, restoration or creation. For example, the following statement completely glosses over the need for protection of existing features:

“It is intended that as much of the NHS area as possible is restored to its natural state over the long-term in order to improve the watershed health for today and future generations.” (p. 63)

From a biodiversity conservation perspective, protecting what exists must be the top priority. We recommend clearly distinguishing between the two and not subsuming ‘protection’ under ‘restoration.’ Both are needed, but protection is paramount. Such clarity is particularly important when ecological offsetting is being contemplated: avoidance of harm/loss must be prioritized.

4. *Offsetting.* We agree that there may be situations where the loss of some natural heritage features will occur, for example, because of necessary infrastructure development. We also agree that in such cases, there should be compensation for unavoidable loss with the goal of achieving a net gain for biodiversity (p. 23). As discussed above, however, the NHSRS should set clear limits to offsetting. Offsetting is risky business, with very little evidence of success in Canada and worldwide. It should be treated as a last resort (as indicated, for example in the provincial wetland conservation strategy, p. 42: “The Ontario government remains committed to offsetting only being used as a last resort.”)

It is concerning that ecological offsetting is listed as the primary mechanism to achieve a net gain of features and a net gain to the NHS (Table 5.1). While there is acknowledgment that in some limited situations this may be the best/only way to achieve net ecological gain on a site-by-site basis, the NHSRS should be based on approaches such as strong environmental protection policies, stewardship and restoration to achieve net gain.

5. *Inadequate Communication.* The LSRCA does a good job of including maps to illustrate the different data and mapping layers that comprise the NHSRS. However, many questions remain about the meaning or purpose of some of the figures/maps. For instance, Figure 4.12 (p. 53) – Corridor Restoration and Stewardship Priorities and Opportunities Tool – indicates that through SPOT, 281 hectares of area will be added to strengthen the main corridors. Is the 281 hectares used to demonstrate how the SPOT works or is this a mapped and designed final outcome? If the latter, as mentioned above, 281 new hectares added to the NHS across the entire watershed is not impressive.



Likewise, it’s hard to understand what Figure 4.13 (p. 56) – Regional and Local Linkages – is communicating. Do the arrows and dots illustrate the process whereby linkages will be identified or has this work already been done? If the latter, this does not illustrate a robust systems-based NHS whereby core areas made up of significant features are all connected by linkages of different widths.

These cores and linkages comprise the fundamental building blocks of an NHS and must be more clearly communicated to the public prior to finalizing the report.

5. *Citizen science.* We are happy to see that citizen science programs are recognized as a way to fill in data gaps and support the monitoring of the watershed. However, citizen science is listed under section 5.3.3 (Education and Outreach) and not recognized in section 5.3.3 (Data Collection and Monitoring). If citizen scientists are going to be taken seriously and their data to contribute to the monitoring of the NHS, citizen science must be valued and recognized as a component of section 5.3.3.

6. *Data.* In addition to the data used to prepare the NHSRS, we recommend the LSRCA incorporate data from Ontario Geological Survey (OGS) for the watershed. The OGS has new data and reports that will be released before the end of the year (e.g., surficial geological maps and a groundwater resource study in southern Simcoe County).

7. *Integration with the GGH NHS.* It’s unclear how a “seamless” overlay can be accomplished between the LSRCA NHS and the GGH-wide NHS (p. 21). It would be helpful if the NHSRS could be more explicit in acknowledging this implementation issue and explaining how the two systems will be integrated. It is in everyone’s interests to have a consistent, well-coordinated approach that operates at different scales.

Thank you again for the opportunity to review this strategy. We trust that our comments will be taken into consideration and would be happy to discuss these with you further.

Yours truly,

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