



**May 29, 2020**

**SUBMISSION TO THE REGION OF DURHAM REGARDING THE ENVIRONMENT AND GREENLANDS SYSTEM DISCUSSION PAPER, DURHAM REGION, SEPT 2019**

**About the Rescue Lake Simcoe Coalition**

The Rescue Lake Simcoe Coalition (RLSC) is an umbrella organization representing 26 groups that empowers local groups to take action to protect Lake Simcoe's health. We focus on promoting dialogue between citizens and their governments around the lake. One of RLSC's primary objectives is to encourage land use planning decisions that will protect the lake as well as forests, wetlands, and working farms within the Lake Simcoe Watershed. Currently, our work centres on maintaining or improving the Lake Simcoe Protection Plan (LSPP) and ensuring its full implementation.

**Background to this submission**

One of the core objectives of the Lake Simcoe Protection Plan is maintaining enough natural cover around Lake Simcoe to keep ecosystem functions intact and to buffer the watershed from the impacts of climate change and phosphorus pollution. The Plan sets a target of 40% *high quality natural cover* ("HQNC", defined below) across the watershed. However, the LSPP contains no mechanism for achieving this target. RLSC is encouraging the Province to work with municipalities and the Lake Simcoe Region Conservation Authority (LSRCA) to develop a multi-year implementation and restoration strategy to achieve the 40% HQNC target and set subwatershed targets.

In 2019, RLSC analyzed and mapped how well existing provincial and municipal policy protects natural features across the watershed. We found that natural heritage features need to be better connected, and that all governments should place greater strategic focus on achieving the 40% HQNC target. We recommend that Envision Durham take into consideration our report, *Environmental Policy Mapping in the Lake Simcoe Watershed: Protecting Natural Cover to Save Lake Simcoe*<sup>1</sup> ("Environmental Policy Mapping Report"). The Durham portion of this map is on page 3, and the legend is on page 4 of this submission.

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<sup>1</sup> Rescue Lake Simcoe Coalition, *Environmental Policy Mapping in the Lake Simcoe Watershed: Protecting Natural Cover to Save Lake Simcoe*, (2019): [https://rescuelakesimcoe.org/wp-content/uploads/2019/11/Environmental\\_Policy\\_Mapping\\_in\\_The\\_Lake\\_Simcoe\\_Watershed.pdf](https://rescuelakesimcoe.org/wp-content/uploads/2019/11/Environmental_Policy_Mapping_in_The_Lake_Simcoe_Watershed.pdf)

The recommendations made in this submission are intended to assist Envision Durham in ensuring that the Regional Official Plan (ROP) fully implements the LSPP, in accordance with ROP policy 2.3.12. Many of these recommendations concern how Durham can contribute meaningfully to the achievement of LSPP targets through its land use planning decisions and its own natural heritage strategy.

*Our responses to the questions posed in Envision Durham's Environment and Greenlands System Discussion Paper follow. Discussion questions 2, 3, and 15 have been omitted.*

### **Other associated documents**

#### Natural Heritage Technical Definitions

The Ministry of Natural Resources and Forestry (MNRF) prepared "Technical Definitions and Criteria for Identifying Key Natural Heritage Features and Key Hydrologic Features for the Lake Simcoe Protection Plan"<sup>2</sup> in 2015. Just like the Oak Ridges Moraine Conservation Plan and the Greenbelt Plan, it is critical for these definitions to be embedded in the ROP and applied across the Lake Simcoe watershed in Durham Region.

#### High Quality Natural Cover

The LSPP states that "high quality" with respect to natural cover means that the cover demonstrates certain characteristics that influence the functional ability of a feature such as shape, age, structure and area of cover. The Province has mapped areas of HQNC that are 25 hectares in size or greater using orthophotography, and started the work of ground-truthing this information<sup>3</sup>. We will refer to the Province's map as a guide to the Region's identification of HQNC areas for protection.

We have included a piece of the province's HQNC map of the watershed that isolates the portion of Durham region that is in the Lake Simcoe watershed, as Appendix A.

#### LSRCA's Natural Heritage System

We will also make repeated reference to the Lake Simcoe Region Conservation Authority's *Natural Heritage System and Restoration Strategy*<sup>4</sup> (LSRCA NH System and Strategy). If the LSRCA's recommended remediation and tree planting work were completed, then up to 60% of the Lake Simcoe watershed would be in some form of natural cover. We recommend that the

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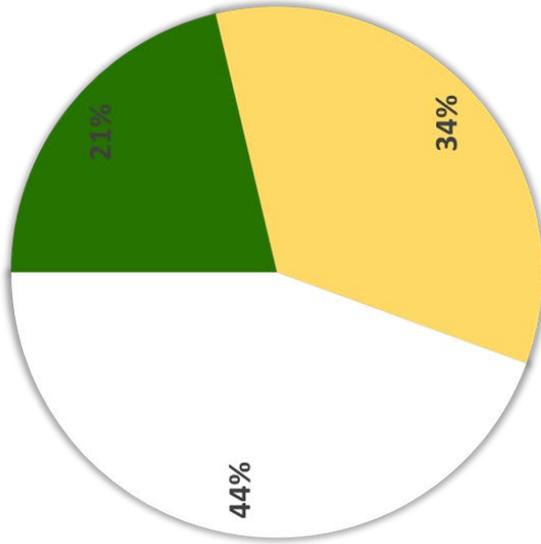
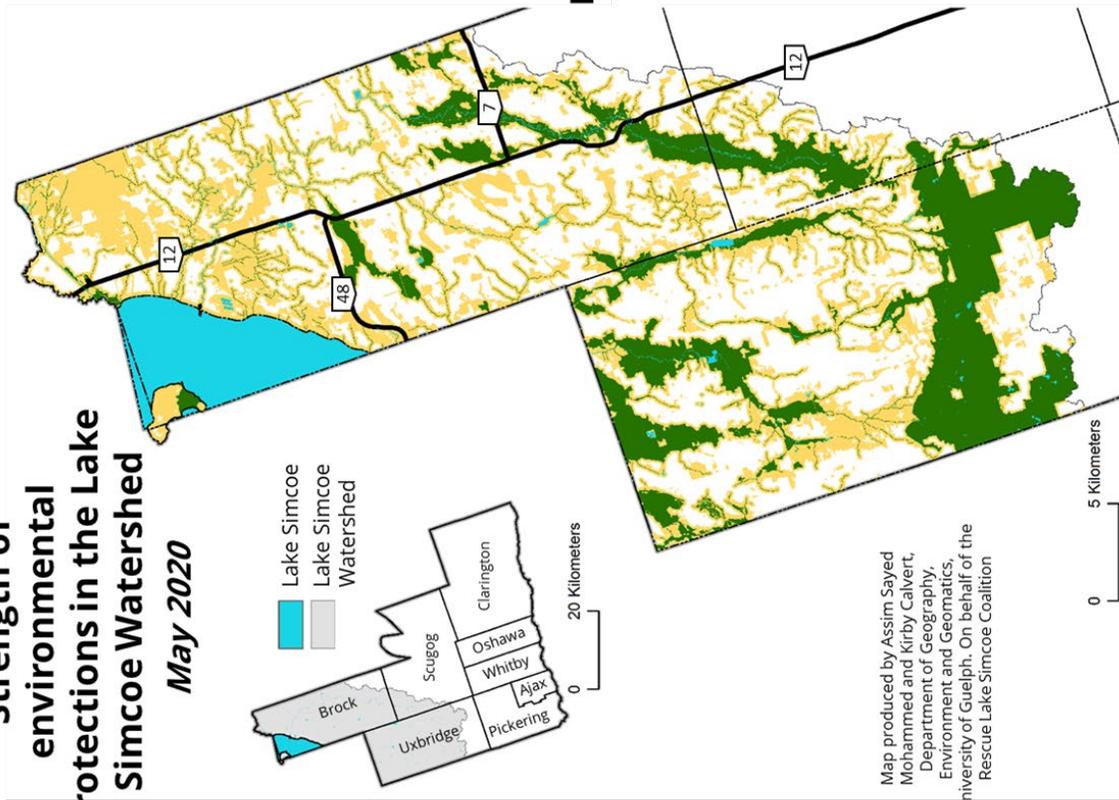
<sup>2</sup> Ministry of Natural Resources, *Technical Definitions and Criteria for Identifying Key Natural Heritage Features and Key Hydrologic Features for the Lake Simcoe Protection Plan*, (2015). [https://rescuelakesimcoe.org/wp-content/uploads/2020/05/lspp\\_knhf\\_khf\\_definitions\\_MNR.pdf](https://rescuelakesimcoe.org/wp-content/uploads/2020/05/lspp_knhf_khf_definitions_MNR.pdf)

<sup>3</sup> Ministry of Natural Resources, *Areas of High Quality Natural Cover in the Lake Simcoe Watershed* (map) <https://geohub.lio.gov.on.ca/datasets/6c670c2076d442f7aff114815d8adcae>

<sup>4</sup> Lake Simcoe Region Conservation Authority, *Natural Heritage System and Restoration Strategy*, (2018): <https://www.lsrca.on.ca/Shared%20Documents/reports/Natural-Heritage-Systems-Restoration-Strategy.pdf>

LSRCA NH System and Strategy should be consulted and adopted in the areas of Durham that fall within the Lake Simcoe Watershed.

# Region of Durham Strength of environmental protections in the Lake Simcoe Watershed May 2020



Proportion of total land area in each 'level of protection'. See legend below

## LEVEL OF ENVIRONMENTAL PROTECTION

- BEST PROTECTED:** These features are subject to policies that prevent or tightly restrict development. Permitted activities are limited to aggregate extraction, wildlife and stewardship, and storm-water management.
- GENERALLY PROTECTED:** These features are subject to policies that allow some site alterations or land cover change, having met criteria and conditions.
- NOT PROTECTED:** These areas are already developed and / or are not subject to environmental protections.



Note that this map does not include data provided by the municipality – namely, it does not include a municipal NHS as an input into the analysis. For details on the data inputs and methodology used to compile this map, see: [https://www.simcoecountygreenbelt.ca/greenland\\_report\\_authors\\_and\\_methodology](https://www.simcoecountygreenbelt.ca/greenland_report_authors_and_methodology)

## Legend: Lake Simcoe Watershed Map of Environmental Policy Protections

| Level   | Definition  | Examples of permitted activities   |
|---|---|--|
| <b>1. BEST POLICY PROTECTION</b>                | <p>These features are subject to policies that prevent or tightly restrict development or other land cover change on them. An Environmental Impact Assessment (EIA) is required to demonstrate environmental impacts of permitted activities are minimal and can be mitigated.</p> <p>Level 1 includes mostly features protected by provincial policies:</p> <ul style="list-style-type: none"> <li>• significant woodlands;</li> <li>• significant valleylands;</li> <li>• Provincially Significant Wetlands (PSWs);</li> <li>• Areas of Natural Scientific Interest (ANSI's);</li> <li>• Lake Simcoe shoreline;</li> <li>• natural areas abutting Lake Simcoe;</li> <li>• Significant Wildlife Habitat;</li> <li>• Provincial Parks;</li> <li>• Natural Areas (Niagara Escarpment Plan);</li> <li>• Core Areas (Oak Ridges Moraine Conservation Plan).</li> </ul> | <ul style="list-style-type: none"> <li>• new aggregate operations, with restoration and environmental impact requirements;</li> <li>• low footprint infrastructure that has been proven to have no alternative;</li> <li>• non-intrusive recreation;</li> <li>• maintenance of existing infrastructure;</li> <li>• fish, forest, wildlife management;</li> <li>• stewardship and conservation activities;</li> <li>• flood or erosion control;</li> <li>• retrofits to stormwater facilities.</li> </ul>   |
| <b>2. MODERATE POLICY PROTECTION</b>            | <p>These features are subject to policies that allow some site alterations or land cover change, having met criteria and conditions. An Environmental Impact Assessment (EIA) is required to demonstrate that environmental impacts are minimal and can be mitigated.</p> <p>Level 2 includes:</p> <ul style="list-style-type: none"> <li>• Setbacks and vegetation protection zones around protected features such as ANSIs, PSWs, permanent and intermittent streams and lakes;</li> <li>• significant groundwater recharge areas and highly vulnerable aquifers;</li> <li>• linkage areas (Oak Ridges Moraine);</li> <li>• Simcoe County Greenlands linkage areas;</li> <li>• features adjacent to level 1 features.</li> </ul>  | <ul style="list-style-type: none"> <li>• new aggregate operations, with restoration and environmental impact requirements;</li> </ul> <p>Having met criteria to demonstrate limited environmental impact:</p> <ul style="list-style-type: none"> <li>• development and site alteration;</li> <li>• wind power facilities.</li> </ul> <p>No Environmental Impact Assessment required for:</p> <ul style="list-style-type: none"> <li>• low footprint infrastructure that has been proven to have no alternative;</li> <li>• non-intrusive recreation;</li> <li>• maintenance of existing infrastructure;</li> <li>• fish, forest, wildlife management;</li> <li>• stewardship and conservation activities;</li> <li>• flood or erosion control;</li> <li>• retrofits to stormwater facilities.</li> </ul> |
| <b>3. NOT PROTECTED BY ENVIRONMENTAL POLICY</b> | <p>These areas do not contain features that are protected.</p> <p>Level 3 includes:</p> <ul style="list-style-type: none"> <li>• farmland;</li> <li>• roads;</li> <li>• settlement areas and built up areas.</li> </ul> <p>The Greenbelt Protected Countryside designation is included because it does not protect Natural Heritage Features. It does, however, restrict settlement boundary expansions.</p>  | N/A  |

The methodology used in this environmental policy mapping report can be found in Appendix B of this submission.

## RESPONSES TO DURHAM'S ENVIRONMENT AND GREENLANDS SYSTEM DISCUSSION PAPER

### 1. Are the current goals for the Environment and Greenlands System still relevant/appropriate? (Page 19)

In general, we recommend strengthening the wording of the ROP's goals for the Environment and Greenlands System to present active commitments and adding all relevant ecological targets from municipal and provincial policies.

This would include a specific goal of maintaining an amount of High Quality Natural Cover (HQNC) in the area of Durham that falls within the Lake Simcoe Watershed consistent with the Lake Simcoe Protection Plan (LSPP) target of 40% HQNC in the watershed.

We recommend that as part of Envision Durham, the Region review official projections of regional climate change impacts and consider their implications in all land use policy and decision-making. The goals for the Environment and Greenlands System should reference and reflect Regional Council's recent declaration of a climate emergency and commit to doing what is necessary to significantly mitigate the impacts of climate change.

Following are recommended wording changes to specific sections of the ROP:

1.2.1 (a) a) to plan growth so that it occurs in an orderly and sustainable fashion;

1.2.1 (b) to prevent degradation of the natural environment and heritage of the Region;

1.2.1 (g) to manage the resources in the Region in an orderly, efficient, responsible and environmentally sustainable manner.

1.3.1 (a) planning to fulfil the distinct needs of Urban Areas and areas where agriculture and open space predominate;

1.3.1 (b) encouraging development patterns that utilize land efficiently, and providing guidance and technical assistance to that end;

1.3.1 (c) preventing adverse effects on significant features and functions of the natural environment resulting from development;

1.3.1 (d) encouraging development that will not have adverse cumulative impacts on the natural, built and cultural environments, and that reflects adaptation to projected climate change impacts on these environments, and providing guidance and technical assistance to that end;

1.3.1 (h) preventing the loss of agricultural lands and ensuring their efficient and sustainable use;

1.3.1 (j) guiding, incentivizing and participating in stewardship of land;

1.3.1 (l) developing the Region in a fiscally responsible manner, with due consideration for the financial value of ecosystem services and financial costs of unmitigated climate change impacts;

2.1.2 To incorporate good community planning and design that enhances the Regional landscape, minimizes pollution of air, water and land resources, mitigates the impacts of climate change and preserves large areas of high quality natural cover.

2.1.4 To align planning decisions with the understanding that there is a relationship between the natural and built environments, the principle of preserving resources and protecting the natural environment for future generations, and Traditional Ecological Knowledge.

2.2.2 In the planning and development of the Region the cumulative impact on the environment shall be taken into account by assessing matters such as, but not limited to, the capacity of the natural environment to accommodate development, particularly ground and surface water resources, the maintenance of connected natural systems, impacts on environmental features and functions, climate change and the preservation of high quality natural cover.

2.2.4 In the consideration of development applications, the impacts on surface water and groundwater resources shall be examined in order to maintain and/or enhance such resources in sufficient quality and quantity to sustain the integrity of ecosystems and meet existing and future needs of the Region's residents on a sustainable basis.

2.2.5 *add the following:* f) required ecosystem services for quality of life, enhancement of the natural environment and adaptation to climate change.

2.2.9 The use of various land securement tools will be pursued as a means of protecting and enhancing the Region's natural environment, with priority given to areas of "high quality natural cover".

#### **4. Should the Region include policies in the ROP restricting or limiting the land application of septage? (Page 36)**

We support the inclusion of policies restricting land application of septage in the ROP, and in particular recommend limiting application of septage near water bodies or ground water sources. We recommend consulting the [Lake Simcoe Phosphorus Reduction Strategy](#) when developing any regional regulation of septage application. The Strategy offers the following examples of best management practices that can be used during the land application of biosolids: surface versus injection applications; buffer zones between application areas and watercourses, mixing biosolids with soil at application to reduce the risk of runoff; and timing of application after rain events.

Recommendations in brief:

- Limit application of septage near water bodies or ground water sources

- Mandate best practices identified in the Lake Simcoe Phosphorus Reduction Strategy

### **5. Should policies regarding ecosystem compensation and valuation be included in the ROP through Envision Durham? If so, are there examples of best practices? (Page 38)**

We support the inclusion of ecosystem compensation and valuation policies in the ROP. We recommend that Envision Durham review the [LSRCA](#) and the [Greenbelt Foundation's](#) evaluations of the value of natural capital in the Lake Simcoe Watershed and the Greenbelt, respectively. The Region should analyse and communicate the value of natural capital throughout Durham in order to articulate to decision makers the economic and ecological rationale for protecting natural features.

In circumstances where laws and policies do not protect features that provide valuable ecosystem services, or that provide important linkages between protected features, the Region can play a role by encouraging or financially incenting landowners not to remove the natural features on their properties, through a program such as [ALUS Canada](#).

Where ecological offsetting is concerned, we recommend emulating the [LSRCA's policy](#).

Recommendations in brief:

- Report on the value of natural capital in Durham Region, following the examples of the LSRCA and the Greenbelt Foundation
- Encourage or financially incent landowners not to remove natural features on their properties that are not protected by law or land use policy
- Emulate the LSRCA's ecological offsetting policy

### **6. How can the ROP support the consideration of Traditional Ecological Knowledge in land-use decisions? (Page 39)**

We recommend that the ROP include Traditional Ecological Knowledge (TEK) in policies 2.2.1 and 2.2.2, as one of the primary environmental factors to be considered in land use decisions.

We recommend incorporating direction to include relevant TEK in the preparation and/or deliberation of development applications wherever appropriate, analogously to requirements for considering the presence of key natural heritage features or species at risk.

In support of these changes, we recommend that the Region provide funding for local Indigenous communities to compile, document and digitize traditional knowledge so that it can be readily available to inform the development approval process. The support for TEK storage within the Community should also be considered to ensure the consultation and inclusion of the Community that provided it as well as to ensure it is being used appropriately.

We also recommend engaging and compensating Indigenous knowledge-holders to consult on the identification of the Region's natural heritage system as part of Envision Durham.

Recommendations in brief:

- Mention TEK in ROP policies 2.2.1 and 2.2.2
- Make TEK a necessary consideration in development applications and approval processes
- Fund Indigenous communities to compile, document, digitize, and store TEK
- Develop and implement a consultation process so that Indigenous communities have oversight of all uses of TEK in land use decisions
- Engage and compensate Indigenous knowledge-holders to consult on the identification of the Region's natural heritage system

### **7. How can the ROP better support environmental stewardship efforts in Durham? What are other examples of best practices? (Page 40)**

The LSPP contains a target of achieving naturalized riparian areas on Lake Simcoe and along streams. As part of its vegetation protection zone policies, and in compliance with policy 6.14 of the LSPP, the ROP should require that active efforts be taken to re-naturalize public areas adjacent to shorelines and streams to a minimum of 30 metres. We also recommend that the Region's stewardship programs include educating and incenting owners of shoreline properties to do the same. We recommend consulting watershed health reports prepared by conservation authorities to identify priority riparian areas for restoration. Such re-naturalization policy should also be applied to linkages between areas of HQNC.

Recommendations in brief:

- Include direction to re-naturalize public areas adjacent to shorelines and streams to a minimum of 30 metres in the ROP
- Include direction to re-naturalize key linkages between areas of HQNC in the ROP
- Create programs to encourage and incent landowners to re-naturalize riparian areas, shorelines and linkages on their properties
- Consult watershed health reports prepared by conservation authorities to identify priority riparian areas for restoration
- Consult the LSRCA NH System and Strategy for further guidance on stewardship activities

### **8. Are there additional factors the Region should take into account when re-considering the Major Open Space Areas designation? (Page 42)**

We recommend alignment with the Province's position on this designation. The "open space" label may inadvertently imply land that is waiting to be put to a useful purpose, and we believe

that the wording should be more precise than that. We approve the term “rural lands” if there is no clearer designation.

Recommendations in brief:

- Adopt the term “rural lands” to refer to open space areas in the ROP

**9. Do you feel that a separate Tourist Activity/Recreational Node designation is necessary in the ROP? If so, do you feel the policies should be enhanced or revised? (Page 44)**

RLSC supports the Tourist Activity/Recreational Node designation so long as uses sanctioned in the ROP align with provincial policy. LSPP policy 6.1(g) provides guidance on appropriate development for facilitating recreational activities on the Lake Simcoe Shoreline.

Recommendations in brief:

- Align land use policy for Tourist Activity/Recreational Nodes with the LSPP in general and LSPP policy 6.1(g) in particular

**10. Should Open Space Linkages and Waterfront Links continue to be identified in the ROP? If so, what additional areas should be identified and how could the policies associated with these areas be enhanced? (Page 45)**

Open Space Linkages and Waterfront Links should continue to be identified in the ROP.

We are concerned that ROP policy 10.3.2 (c) may function as a loophole allowing development to proceed before an area has been properly assessed for the presence of key natural heritage features, and recommend clearer wording on what the intent of this policy is. We strongly recommend against allowing development that could adversely affect an area’s potential to link areas of HQNC before appropriate study of such potential is conducted. We urge collaboration between Durham Region and the area municipalities for the full development of policies with respect to linkage areas as soon as possible, in accordance with the directions in the Growth Plan for the Greater Golden Horseshoe<sup>5</sup> and in the 2020 Provincial Policy Statement<sup>6</sup> that connectivity of natural features should be maintained, restored, or improved.

We also recommend identifying additional areas to be identified as Open Space Linkages in Schedule A of the ROP in the process of identifying a regional natural heritage system. The Province’s mapping of HQNC areas and the LSRCA NH System and Strategy can provide guidance for doing so, with additional research to ground-truth features as necessary. Identification of Open Space Linkages should take into account the ecological diversity and function that will develop in the future on undeveloped land.

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<sup>5</sup> Ministry of Municipal Affairs, *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*, (2019) s. 4.2.2.3 (a)ii

<sup>6</sup> Ministry of Municipal Affairs, *Provincial Policy Statement*, (2020) s. 2.1.2

Finally, we recommend the use of secondary plans to provide additional protections to linkages.

Recommendations in brief:

- Continue to identify Open Space Linkages and Waterfront Links in the ROP
- Investigate and close any potential loophole that ROP 10.3.2 (c) allows in the protection of natural heritage in linkage areas
- Develop policies for linkage areas that comply with provincial policy
- Identify important linkage areas mapped by the LSRCA and the Province as Open Space Linkages
- Take into account the ecological diversity and function that will develop in the future on undeveloped land
- Use secondary plans to provide additional protections to linkages between natural features

### **11. How can the Region best support the protection and enhancement of significant woodlands in Durham? (Page 54)**

In reviewing the Region's forest cover target, we recommend adopting the LSRCA's Natural Heritage System and Strategy and its target of 40% forest at a watershed scale.

In order to meet the LSPP's 40% High Quality Natural Cover (HQNC) target, we recommend that the Region collaborate with the MNRF, LSRCA and municipalities to map all known forest patches in the Lake Simcoe Watershed and categorize them by the size thresholds set out in the technical definitions (4 or 10 hectare thresholds depending on location). Any woodlands below these thresholds should then be recommended for evaluation to determine whether they meet the density or crown cover metrics of the High Quality Natural Cover definition. Areas of HQNC, in particular those exceeding 25 hectares in patch size, should be prioritized for protection.

We recommend that subsection 2.3.19 be strengthened by using "shall" instead of "will".

We recommend adding land acquisition and collaboration with land trusts to the list of activities that the Region undertakes to manage woodlands.

Recommendations in brief:

- Adopt the forest cover target of the LSRCA NH System and Strategy
- Map and ground-truth forested areas and prioritize HQNC areas for protection
- Amend ROP section 2.3.19 to replace "will" with "shall"
- Incorporate land acquisition into the Region's strategy for managing woodlands

## **12. Should there be targets included in the ROP for other natural heritage and hydrologic features in addition to woodlands? (Page 54)**

The following targets and indicators from the LSPP's Chapter 6, Shorelines and Natural Heritage, should be included in the ROP, applying to the Lake Simcoe watershed area:

### Targets

- No further loss of natural shorelines on Lake Simcoe
- Achieve a greater proportion of natural vegetative cover in large high quality patches
- Achieve a minimum 40 percent high quality natural vegetative cover in the watershed
- Achieve protection of wetlands
- Achieve naturalized riparian areas on Lake Simcoe and along streams
- Restore natural areas or features
- Achieve increased ecological health based on the status of indicator species and maintenance of natural biodiversity

### Indicators

- Change over time in the proportion of land in wetland, forested valleyland, natural riparian and upland forest taking into account habitat quality
- The degree of fragmentation of wetland, forested valleyland, riparian and upland forest
- The integrity of natural shoreline, i.e. the amount of shoreline that is either undeveloped or maintained in a naturalized state
- Change over time in the status of key biological indicators, including species of conservation concern
- Integrity of significant recharge areas

These targets should be operationalized through phased development policy that makes monitoring and demonstrated results toward achieving the targets a necessary precondition to further development approvals in LSPP areas.

Further, we recommend amending the definition of *Watershed Plan* in the ROP to state that watershed plans shall include ecological targets outlined in the Lake Simcoe Protection Plan.

### Recommendations in brief:

- Adopt the natural heritage targets of the LSPP and reference them in the ROP
- Use development phasing policy to operationalize LSPP targets
- Reference ecological targets in the definition of *Watershed Plan*

**13. Should the Region include more detailed policies prescribing minimum vegetation protection Zones where they are not otherwise prescribed by provincial policy)? (Page 59)**

We commend the intent stated in the discussion paper to confirm enhanced restrictions within vegetation protection zones along the Lake Simcoe Shoreline. Rather than recommending vegetation protection zone policies other than those already prescribed by provincial policy including the LSPP, we recommend reviewing the ROP for compliance with LSPP policies 6.1, 6.2, 6.4, 6.23, 6.24, 6.26, 6.27-29, 6.33, 6.43, 6.45.

We recommend specifying in the ROP that vegetation protection zones determined in accordance with Section 2.3.16 should be at least 30 metres when adjacent to Lake Simcoe, in compliance with LSPP policy 6-33.

We recommend amending ROP Section 2.3.17 to include significant valleylands and natural areas abutting Lake Simcoe in the list of features requiring a minimum 30 metre vegetation protection zone, in compliance with LSPP policy 6.24.

Because many of the uses permitted in Major Open Space Areas are not permitted on the Lake Simcoe Shoreline per policy 6.1 of the LSPP, we recommend making explicit mention of the LSPP in policy 10C.1.2 of the ROP (or elsewhere in Section 10C as appropriate). We recommend directing area municipalities to ensure that their official plans delineate the extent of the Lake Simcoe Shoreline protected by the LSPP and implement policies 6.1 to 6.11 of the LSPP. We recommend including a policy similar to 10.C.2.1 to set out the requirements for development along the Lake Simcoe Shoreline contained in LSPP policies 6.3, 6.11, 6.26, 6.27 and 6.29.

Recommendations in brief:

- Ensure ROP compliance with LSPP policies 6.1, 6.2, 6.4, 6.23, 6.24, 6.26, 6.27-29, 6.33, 6.43, 6.45
- Specify in the ROP that vegetation protection zones determined in accordance with Section 2.3.16 should be at least 30 metres when adjacent to Lake Simcoe
- Amend ROP Section 2.3.17 to include significant valleylands and natural areas abutting Lake Simcoe in the list of features requiring a minimum 30 metre vegetation protection zone
- Ensure delineation of the LSPP-protected Lake Simcoe Shoreline area and implementation of LSPP Shoreline policy in official plans
- Include in the ROP a policy similar to 10.C.2.1 to set out the requirements for development along the Lake Simcoe Shoreline contained in LSPP policies 6.3, 6.11, 6.26, 6.27 and 6.29.

#### **14. Recognizing the two-tier municipal system, how should the Region best protect the natural heritage system, features, and areas in the ROP (Overlay, designation, level of detail)? (Page 62)**

We commend the decision to update the Region's environmental mapping and to identify a regional scale natural heritage system. This is a crucial step in preserving the health of all local watersheds, including Lake Simcoe.

In general, we recommend following the example of York Region's Official Plan, which contains detailed description of natural heritage feature types that correspond with the land use plans that apply, including the Oak Ridges Moraine Conservation Plan and the Greenbelt Plan. These are based on MNRF's technical definitions of the relevant natural features. This makes it easier for all involved to identify, protect, and map these features. The leadership and support of upper tier municipalities allows lower tier municipalities to help build a more robust natural heritage system.

Our Environmental Policy Mapping Report provides a more detailed overview of the need for improved mapping of natural heritage features in the region.

We recommend that the Region's environmental mapping update include:

- Adopting the LSRCA Natural Heritage as mapped in Figure 4.15, pg. 128 of the NH System and Strategy. To make the most of the ROP update's impact on developing and mapping a robust natural heritage system, this may involve encouraging those municipalities that have not adopted it to do so. Pay particular attention to the need to naturalize riparian buffer zones.
- Employing the MNRF's technical definitions for the identification of HQNC and key natural heritage features. It is recommended that these definitions are embedded in the ROP for absolute clarity about how to appropriately assess natural heritage features in the Lake Simcoe watershed.
- Mapping high quality natural cover by patch-size of 25 hectares plus, and encouraging municipalities to do the same. The Province's mapping should be used as a starting point, and research should be undertaken to ground-truth features as necessary.
- Encouraging municipalities to enact interim control bylaws to protect the mapped areas from rezoning or land use changes until natural heritage system identification research is complete.
- Directing area municipalities to undertake natural heritage inventories, collaborating with Conservation Authorities to identify key features, linkages and restoration areas, and to update these inventories at a minimum every five years.
- Including all natural heritage features identified by area municipalities in Regional maps, and implementing a policy that Regional maps will be updated to include all such features identified by area municipalities in the future.

- Directing municipalities to have regard for the ecological diversity and function that will develop in the future on undeveloped land when identifying their natural heritage systems.
- Emphasizing the socioeconomic, cultural and ecological significance of the natural heritage system in the ROP and all other relevant policies and documents.

**16. What should the Region’s role be in the protection of land for environmental purposes and how can the ROP provide further policy support for this? (Page 86)**

We recommend partnership with local land trusts to coordinate the acquisition of priority properties for permanent protection. We recommend that in all land acquisition decision-making processes, priority be given to linkage lands and areas of HQNC, in particular patches of 25 hectares or more, that are not currently protected by provincial policy (see Appendix A, Durham Region area of the Lake Simcoe watershed’s High Quality Natural Cover (HQNC) map). Area municipalities should also be encouraged to acquire land for protection. Indigenous communities should be engaged in the acquisition process and co-management arrangements should be made as necessary.

**17. Are there any additional considerations or best practices that the Region should be considering when updating the Region’s EIS policies? (Page 87)**

We recommend updating Section 2.3.43 of the ROP to state that Environmental Impact Studies will include, where required, natural heritage evaluations as prescribed in LSPP policies 6.3 and 6.25, similar to that section’s existing direction that EIS may include additional requirements for the ORMCP area.

Recommendations in brief:

- Include direction in the ROP to ensure that EIS will comply with LSPP policies 6.3 and 6.25

**18. Are there any other land use compatibility issues the Region should be considering through Envision Durham? (Page 88)**

All land uses should be compatible with official projections of climate change impacts on Durham’s Greenlands System. This includes taking into account what measures will be needed to mitigate the risk and extent of flooding and to provide shade to keep streams cool enough for fish spawning.

Recommendations in brief:

- Consider climate change projections in land use compatibility assessments

**19. Have we missed any trends that you feel should be reviewed and considered in the environment/Greenlands System context as part of Envision Durham? (Page 91)**

As previously mentioned, Envision Durham must align all land use policies and decisions in the ROP with the trends and projected changes to Durham's Greenlands System resulting from climate change.

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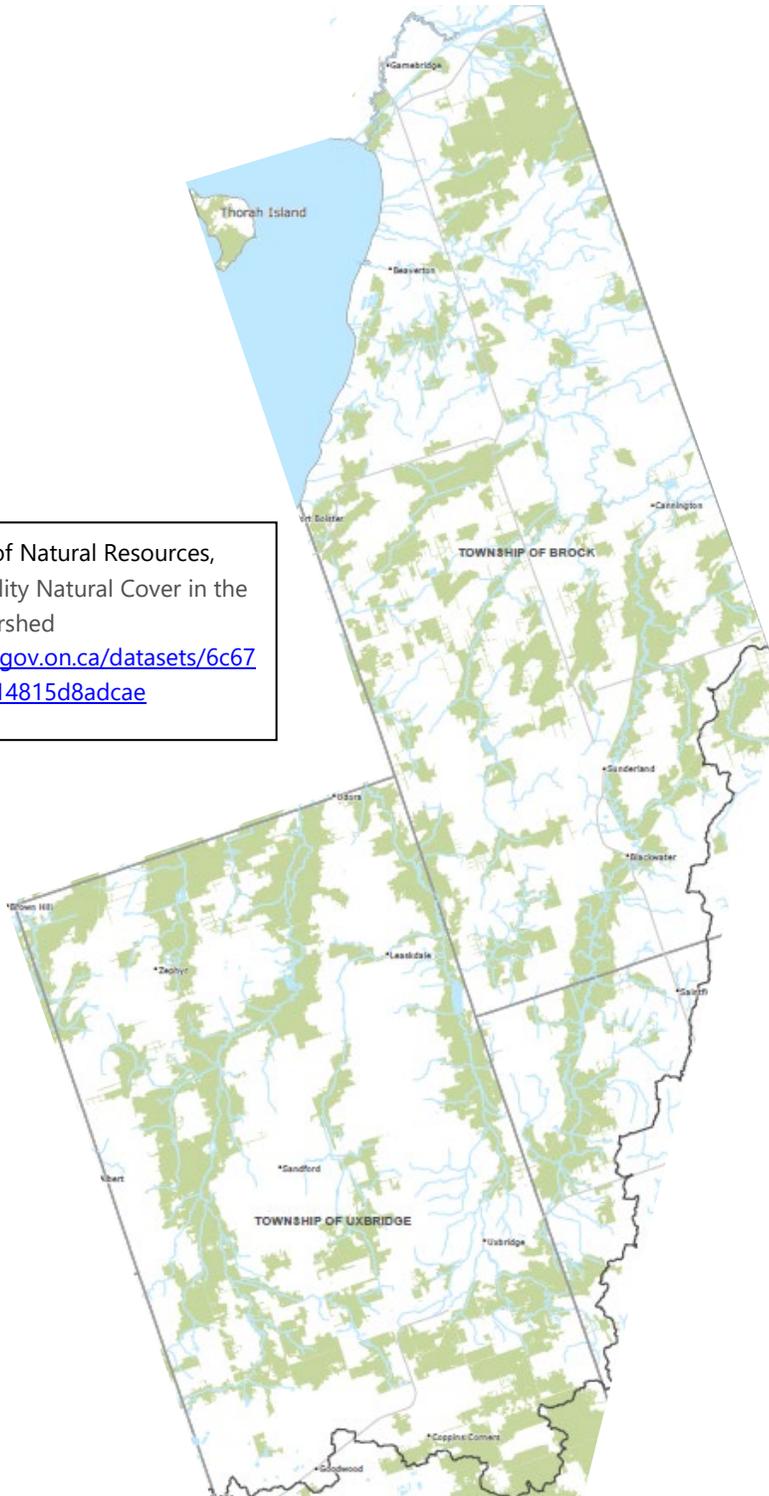
[www.rescuelakesimcoe.org](http://www.rescuelakesimcoe.org)



*Thank you to the Friends of the Greenbelt Foundation for their support.*

## Appendix A – Durham Region area of the Lake Simcoe watershed’s High Quality Natural Cover (HQNC) map

Source: Ministry of Natural Resources,  
Areas of High Quality Natural Cover in the  
Lake Simcoe Watershed  
<https://geohub.lio.gov.on.ca/datasets/6c670c2076d442f7aff114815d8adcae>



**Appendix B – Methodology Rescue Lake Simcoe Coalition’s Environmental Policy Mapping reports**

