



Friends of the Don East

Working to Protect and Restore the Don Watershed

July 12, 2004

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Dena Lewis
Toronto and Region Conservation Authority
PDF via e-mail c/o Fia Amis

Re: **FODE Position Paper on Terrestrial Natural Heritage Strategy System**

Dear Ms Lewis,

Please accept this letter as FODE's position paper on the TRCA's Draft Terrestrial Natural Heritage Strategy System (TNHSS). These comments reflect the participation of two of the members of the Board who attended the public meeting held June 14 and comments on the TRCA's draft document by other members of the Board, and has been approved by the Board. We hope you find the comments below helpful and that they will assist you in preparing your next draft.

First of all, we think this work is extraordinarily important and, as stated on June 14, we believe the vision for protecting the natural resources of the region is the cornerstone for the future sustainability for the region's ecological integrity. We thank the TRCA for the all the effort embodied in the draft.

We believe, furthermore, that the TNHSS:

- Must be expanded, as suggested in the third paragraph of the document and stated by several people at the public meeting held on June 14, to include and/or be positioned as one component of a series of complementary strategies that address the aquatic, hydro-geological, and other key ecological features of the region; and,
- Would benefit from a widespread public marketing campaign, to both the public at large and senior government funding agencies, with the object of securing the same type of community support that enabled New York City to secure the long-term protection of its upstream watersheds.

While we continue to hold these over-archingly positive views of the Draft Strategy, significant questions have arisen in our assessment of the document since June 14. Our concerns include:

1. While the second and several subsequent paragraphs refer to the goal of 30% natural cover for the watershed, we suggest the document needs a short, well-crafted vision statement, which we think could include a strong reference to Environment Canada's work, as referred to in paragraph 6 on page 2. We also suggest the vision statement refer not just to the goal that healthy watersheds require 30% of its area be retained or restored to natural cover, but also include reference to the subsidiary goals of 10% as wetland, that more than 75% of stream length should have 30 metre wide riparian buffers, and that the TRCA develop and articulate a reasonable target for total impervious surface within the Region;
2. The document needs to identify core aspects of an implementation strategy, aspects that can be fleshed out in greater detail at a later time. For example, it appears that the document suggests the addition of over 31,000 hectares of areas of natural cover, which we were told on June 14 would be targeted over a 100-year period. A simplistic interpretation of an implementation plan along these lines might suggest that natural cover be acquired at the rate of 310 hectares per year. While this may be feasible from a number of perspectives, we are concerned that the addition of just 6,200 hectares over the next 20 years would be totally inadequate given current population growth and the current rate of urban sprawl. We suggest, therefore, that the Authority work to position high short-term targets, such as 20,000 hectares within 10 years, and the rest within 20 years, in conjunction with other key agency initiatives such as the Oak Ridges Moraine Conservation Plan, Source Protection Planning, and the Greenbelt initiative;
3. We believe the issue of acquisition and securement needs extensive additional effort. One key issue not touched on in item 2 above is the potential cost of land acquisition, although clearly many lands under existing municipal, provincial, or federal jurisdiction could be guaranteed to remain in natural cover, regardless of ownership or management agreements. Nonetheless, we are concerned that:
 - a there is no direct statement as to the TRCA's desire to acquire ownership of or a management role in extensive new land holdings. We think there needs to be more detail on the perceived split of TRCA-owned or managed lands versus stewardship agreements for natural cover with existing land owners, including other government agencies; and,
 - b the current draft is not as positive or pro-active as it might be with respect to existing agricultural lands. We are unaware of the potential impact on agricultural lands encompassed in the goal of expanding natural cover from 18 to 33 percent in rural areas (chart, page 15). We suggest, however, that the overall goal of achieving 30% natural cover needs be

achieved by encouraging the return of some woodlots, wetlands, and riparian cover through stewardship agreements with all area farmers, rather than by acquiring agricultural lands and converting them into full natural cover. We encourage the TRCA to work with members and organizations serving the area's existing agricultural community, and to ensure that agriculture remains a strong part of the culture of our headwaters; and,

4. Finally, we note some concerns about the ability of the TRCA to implement this plan. We urge the TRCA to be prepared to either seek the FULL support of senior levels of government as will be required to adequately resource the delivery of the TNHSS, as well as your other priorities which are also currently under-resourced, and for which we continue to hope for significantly increased funding, or be prepared to turn the stewardship effort of achieving 30% regional natural cover over to another organization with a mandate and the resources to pursue this goal.

In conclusion, while we cannot endorse the Strategy at this time, we hope to be able to endorse it in the future. We urge you to pursue the vision, develop an implementation framework, continue to engage community-based environmental organizations in the strategy, and to identify and obtain the proper resources, for the TRCA or another organization, to ensure successful implementation in the future.

We thank you again for the development of the Terrestrial Natural Heritage Strategic System, for conducting the public consultations held in June, and for inviting comment. Please feel free to contact the undersigned at your convenience to clarify or augment any of the contents of this position paper.

Sincerely,

Andrew McCammon
Chair

cc Selected TRCA Senior Staff and Members of the Board
Selected local municipal councillors and staff
Federal and Provincial RAP representatives
Task Force to Bring Back the Don
Policy Team, Don Watershed Regeneration Council
Selected Sister Organizations
Joanna Kidd, LURA Consulting