



Ducks Unlimited Canada
Conserving Canada's Wetlands

July 6, 2012

Bernard Shalka
Official Plan Review Coordinator
Planning Department
County of Prince Edward
332 Main Street
Picton, ON K0K 2T0

RE: Issues Paper #5: Natural Environment, 5-Year Review of the Prince Edward County Official Plan

Dear Mr. Shalka,

Prince Edward County contains important natural heritage features that provide vital services to its residents, and this Official Plan review provides an excellent opportunity to protect those features by incorporating the latest science, information and planning approaches.

The County has recently released Issues Paper #5: Natural Environment, to encourage discussion and feedback on natural heritage issues. The issue paper states that this assist with the creation of policy approaches for dealing with these issues as part of the official plan review. We are pleased to provide the following comments and recommendations on the issue paper as part of this discussion.

Section 2.3.1 Wetlands

1. We recommend that the MNR's wetland information (referred to as the Wetland Unit layer in Land Information Ontario) be used for planning purposes and deriving statistics, and that wetlands be categorized as 'evaluated, provincially significant,' 'evaluated non-provincially significant' and 'unevaluated' in issue papers and future policies. The current reference to 'permanent wetlands' in this section of Issue Paper #5 is unclear, as both evaluated and unevaluated wetlands are primarily permanent wetlands.

Using the MNR wetland information, we estimate the following wetland coverage:

Wetland Status¹	Hectares
<u>Evaluated Wetlands</u>	
Provincially Significant	9,977.3
Non-Provincially Significant	1,199.8
<u>Unevaluated Wetlands</u>	
	11,075.6
Total	
	22,252.7

¹ source: OMNR's Wetland Unit in LIO (compiled May, 2011)

2. Ducks Unlimited has developed a factsheet on wetlands and their benefits specifically for Prince Edward County. This document would provide an excellent supplement to the issues paper, either as an appendix, or a separate file on the County's Official Plan Review website. We have included the factsheet with this letter.

Section 3.3 Natural Heritage Systems Planning

DUC staff participated on the multi-partner Working Group during the development of a stakeholder-based natural heritage system that includes Prince Edward County. We support the preferred scenario that was selected by the Group, and are pleased to see the planning process referenced in Section 3.3 and Appendix F2 of Issues Paper #5.

3. Now that the planning process has been completed, we recommend that the final report be added to the County's Official Plan Review website. This will notify the public and stakeholders of the extensive work involved in identifying the natural heritage system, and the broad support for its use. We have included the report with this letter.
4. Further, we recommend that the preferred scenario data layer created during the development of the natural heritage system be added to County's interactive public GIS website, along with a link to the website from the County's Official Plan Review website.

Section 4.2.1 Provincial Policy Statement

This section lists the natural heritage features for which the Provincial Policy Statement (PPS) restricts certain activities, but does not acknowledge the sections that encourage the use of natural heritage systems approach. Specifically, PPS section 2.1.2 states that, “the diversity and connectivity of natural heritage features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored and where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.” Section 2.2.1e reiterates the importance of maintaining linkages and related functions for the protection of water quality and quantity. Further guidance is provided in MNR’s 2010 Natural Heritage Reference Manual.

5. It is unfortunate that this aspect of the PPS is overlooked in the County’s Issues Paper #5. We recommend the drafting of natural heritage policies during the official plan review process focus on enhancing and protecting the system, in addition to protecting the natural features and areas.

We look forward to providing comments on draft policies as part of this Official Plan Review. Please feel free to contact me at anytime to discuss these comments on Issue Paper #5, or if you require additional information on wetlands.

Sincerely,



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