



January 4, 2013

Broader Landscape Approach
Ministry of Natural Resources
Policy Division
Broader Landscape Approach
300 Water Street, Floor 5
Peterborough, ON K9J 8M5

To Whom it May Concern;

Re: Conservation Ontario's Comments on "Taking a Broader Landscape Approach – A Policy Framework for Modernizing Ontario's Approach to Natural Resource Management" (EBR #011-7540)

Overall, Conservation Ontario (CO) is supportive of the Ministry of Natural Resources' (MNR) initiative to take a broader landscape approach, as part of its framework for modernizing Ontario's approach to natural resource management. The authors of this document are to be commended for their research and effective uses of relevant examples to justify their positions and proposed courses of action. Conservation Ontario's comments are provided primarily in response to the questions posed in the Policy Framework document.

SOME KEY POINTS

Conservation Ontario strongly supports that managing at the watershed level is an ecologically meaningful scale of management for water and related natural resources; particularly in populated areas of the province. It is at a scale where science can be relevant to local decision-makers (e.g. municipalities, resource managers) and, through integration and collaboration, it can be scaled up for federal and provincial decision-makers and enables an adaptive management system to be in place. The partnership around low water and flood programs highlighted on p.17 is a good example. Conservation Ontario encourages the Ministry to put priority on further consideration of how watershed management and its Conservation Authorities can be a strong support for its transformation as per the recent Conservation Ontario Whitepaper "Watershed Management Futures for Ontario" (Oct 2012) at <http://www.conservationontario.ca/resources/reports/index.html> .

Success of a landscape approach will require an increased reliance on partnerships for program implementation purposes and to ensure meaningful contact with the local community to keep in touch

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with realities on-the-ground. Conservation Authorities (CAs) could be key partners to enabling economies of scale and integrating and coordinating across programs and management functions. As MNR moves forward in the short-term with “reviewing the core programs and services to become more efficient and sustainable”, it is suggested that it is probably most efficient, for the relatively small geographic area of Ontario where 90% of Ontario’s population resides, to build upon the existing watershed management model.

RESPONSES TO KEY QUESTIONS

1. Do you have any comments about MNR moving toward managing natural resources over broader areas and longer time frames?

As natural systems (natural heritage and water resources) frequently operate over broad areas and may take many years to show response to various stressors and change (including management activities) it is appropriate that the Ministry move towards this type of management. Scientific data which is collected over longer periods of time and across broader scales can often provide the best and most compelling data which in turn, can be used to make sound policy decisions. As noted in the proposed policy framework, landscape scale management needs to provide guidance to allow finer scale management to occur. This is particularly important given that decisions will still be made at finer scales or site level and for shorter time frames by resource managers. It is critical that the broader framework provide both direction and technical tools so that these finer scale decisions can be nested within the broader framework. These finer scale decisions will also need to be assessed for their implications on the broader landscape or over time.

2. What aspects of the current system or programs could change? Which should remain the same?

Further to the “Key Points” made above, improved coordination with related agencies involved in ecosystem management would be a key recommended change to the current system. Taking a broader landscape approach should include an analysis of opportunities for integration and collaboration with other resource management agencies working on the same landscape. MNR’s broader landscape approach could set the stage for other agencies to participate in resource management and the framework should be set up to encourage province-wide collaboration. Good examples of the Province setting the framework for province-wide collaboration include the Provincial Flood Forecasting and Warning and Low Water Monitoring Program partnerships which CAs have with the Ministries.

3. Do you feel that there are additional or different goals that should be included in this framework?

The document identifies two goals:

- Adopt a modern and sustainable approach to managing Ontario’s natural resources over broader areas and longer time periods.
- Support, enable and advance ecosystem-based, landscape management approaches in Ontario over time.

Elements for the proposed framework and considerations are also identified as part of the discussion of the goals, but there is no clear articulation of the priorities and outcomes. The identification of priorities and outcomes for the goals will be essential to the Ministry’s ability to successfully transform. It is recommended that these areas be a focus of future Ministry consultation. As stated under the “Key

Points” above, the future of watershed management in Ontario should be a priority in the path forward.

4. Do you agree with the proposed elements and considerations, or should different ones be included?

Overall, Conservation Ontario is supportive of the proposed elements and considerations, although some of the considerations require additional clarification, or should be related to other elements of the framework.

Element 2 speaks to integrating and coordinating which is strongly supported by Conservation Ontario. Considerations include leveraging and coordinating with the work of others, but there is no discussion of formal partnerships or delegation and limited reference to the work that other agencies are undertaking as resource managers. As MNR focuses on broader landscape scales and longer time frames, there is still the need to operate, coordinate and partner at finer scales. The provision of “clear policy and guidance” is also strongly supported, but this should be coupled with sound technical guidance based on quality science and knowledge of the resources and systems in question. Technical information and tools need to be available and applicable to those that are making resource management decisions at finer scales that align and nest within the broader management scale. With regard to leveraging and coordinating with the work of others, there is a notable lack of reference to the opportunity presented by Conservation Authorities as described in more detail under ‘Key Points’ above.

Under Element 1, “Manage at appropriate scales” broader scale approaches can also allow for the assessment of cumulative effects for management actions and activities either positive or negative. It is suggested that in some cases cost-benefit analysis may be helpful in determining the appropriate scale. This cost-benefit analysis should also be informed by a risk assessment.

Element 3, “Assess, Manage and Mitigate Risk” speaks to refining risk management based on lessons learned. Having an appropriate framework to monitor and evaluate outcomes will be critical to allow this to happen. Consideration VII indicates that a standard risk management framework will be used to assess, manage and mitigate risk, however it is not likely reasonable that a single “standard” framework will be appropriate for all activities or areas of the Province. The differences between resource protection, resource management, and protection from natural hazards may also warrant different types of risk assessment and management.

Element 4, “Focus Science and Information Resources” is supported. The Ministry is encouraged to “collaborate with and leverage the work of scientists in other agencies”. The development of the systems and processes for collecting and sharing data is part of the second goal which will be implemented over the longer term. The collection, interpretation and dissemination of information and data are extremely important and often many years of information are required to determine trends, changes and responses of ecosystems. The Ministry is urged to complete this aspect of modernization early in the process so that information and advice is available when required by resource managers. When developing the information strategy, consulting with local resource managers will be essential to ensure that there is adequate incentive and buy-in for them to participate in this information sharing.

Element 5 “Manage adaptively” is also supported, particularly in light of climate change. Consideration XII “review the effectiveness of management strategies over time” is also an important consideration and will require target setting as well as ongoing effort to monitor, measure and advance the science and understanding.

5. What outcomes would you like to see with respect to the management and use of natural resources in Ontario?

Section 5, “Path Forward” mentions both outcomes for ecosystems and core priorities for MNR. As the Ministry moves towards modernization, defining priorities and desired outcomes is critical and will require extensive consultation. Priorities and outcomes should be established before defining the landscape approach for management.

Some outcomes that might be considered include:

- Greater integration amongst all organizations in Ontario sharing similar resource management goals;
- Increased monitoring to assess patterns and cumulative impacts, resulting in better adaptive management decisions;
- The approach to natural resources management is effective and sustainable and able to provide sound guidance at a variety of scales (both spatially and temporally);
- Water quantity (and quality) is managed effectively for all uses;
- Risk of loss of life and property damage from natural hazards is minimized;
- Resilient biodiversity and habitats and the conservation of native biodiversity is achieved in Ontario for future generations; and,
- The science of natural heritage and resource management is advanced and accompanied by specific knowledge of Ontario’s ecosystems and their responses over time.

Overall, Conservation Ontario is supportive of the Ministry of Natural Resources’ proposed policy framework for modernizing Ontario’s approach to natural resource management, and looks forward to further discussion on how watershed management can support MNR’s transformation. Should you have any questions regarding these comments, please contact myself at extension 223.

Sincerely,



Bonnie Fox
Manager, Policy and Planning

c.c. All Conservation Authorities, Chief Administrative Officers