



HEALTHY COMMUNITIES • SUSTAINABLE COMMUNITIES

July 22, 2016

Ms. Katie Novacek
Municipal Planning Advisor
Ministry of Natural Resources and Forestry
Policy Division
Natural Resources Conservation Policy Branch
Natural Heritage Section
300 Water Street
Peterborough, ON K9J 8M5

**Proposed wildland fire assessment and mitigation standards
Wildland Fire Risk Assessment and Mitigation: A Guidebook in support of
the Provincial Policy Statement, 2014 – DRAFT
EBR Registry Number 012-7075**

Dear Ms. Novacek,

On behalf of the Ontario Professional Planners Institute (OPPI), I am submitting the Institute's response with regards to the Province's review of wildland fire assessment and mitigation standards in support of the Provincial Policy Statement (PPS) – Draft Guidebook: EBR Registry Number 012-7075.

OPPI is the recognized voice of the Province's planning profession. Our almost 4,500 members work in a range of Government Ministries and agencies, including municipalities and conservation authorities, and in private practice, in fields that include urban and rural development and environmental planning. The OPPI members who contributed to this review have regular professional involvement in the interactions between the Ministry of Natural Resources and Forestry's (MNRF) planning and resource management activities, and the planning and development process generally. OPPI members meet quality practice requirements and are accountable to OPPI and the public to practice ethically and to abide by a Professional Code of Practice. Only Full Members are authorized by the Ontario Professional Planners Institute Act, 1994, to use the title "Registered Professional Planner" (or "RPP").

OPPI members have reviewed the draft Guidebook from the perspective of RPPs who provide their professional services and expert opinions to the public, private and not-for-profit sectors in Ontario. While writing this submission, we took into consideration our earlier policy submissions to the province. Copies can be found at: www.ontarioplanners.ca/policy

Our comments on the draft Guidebook are as follows:

1. MNRF has produced a document that provides considerable support for the implementation of the new PPS policy 3.1.8. We would like to congratulate the Ministry of producing a high quality draft for review.
2. Following the recent fire in Fort McMurray, Alberta, we urge the MNRF to review the Influence Area. Is 100 metres enough? Should the issue of the acute toxicity of the combusted products of modern urban development also be addressed? We believe that these are important questions that should be addressed.
3. The Guidebook does not distinguish between the region of continuous forest, and the southern regions where forest consists of discontinuous patches. In the latter, while there can be development/fire hazard interface problems, these are very localized and any forest fires are also going to be very localized. (The same is true of grass fires). This is a local fire management issue and not generally of provincial interest.

While no municipality should be discouraged from adopting wildland fire planning policies if it feels it needs these, the draft Guidebook could offer some direction that makes clear that within the continuous forest area (Ecoregion 5E and north, or the Fire Region as shown on fig. A1-1, as MNRF considers appropriate), Official Plan (OP) policies to implement PPS policy 3.1.8 are a must, while south of that area, these should be optional.

4. In the interest of keeping things as simple as possible, more guidance should be provided on what is expected from applicants. First, #3 above is a form of triage. Second, in the part of the province where OP policies are a must, many municipalities still have large non-forested areas, and not just in their settlement areas. It may be unwise to map hazardous forests on OP schedules due to their dynamic nature, but OP policies could require simply that applicants determine on their own whether there are forests within x metres. Applicants could just check a box on a new row that would be added to the PPS conformity checklists that often form part of planning application forms. If the answer is "yes" (forest within x metres), then the applicant would proceed directly to a Level 2 site assessment.

OP policies should also make clear that a Level 2 assessment does not need to be a standalone study, and that it can form part of an Environmental Impact Statement (EIS), site evaluation report, etc., where these are required.

We do not believe that a wildland fire assessment needs to be part of every application (sec. 7.1.3). It is not generally required, for example, that all applications include archaeological studies, these are only required if the

application is of a certain size and/or is in an area of higher archaeological potential.

5. Fig. 6-1 on p. 27 highlights a potential conflict that the draft Guidebook does not address. Ecoregions 4W, 4E, 5S, and 5E are where the largest number of site-specific assessments are needed and will be conducted. These ecoregions are characterized by coniferous shorelines and deciduous uplands. These also typically have OP policies in their rural (heavily cottage) areas, prohibiting or severely limiting vegetation removal within 30 metres of shore. Those shorelands are mostly coniferous and therefore, according to the Guide, more hazardous. While shoreland protection policies are technically not a Provincial interest, these policies have become ingrained across cottage country over the last 30 years, not only for aesthetic reasons, but also to protect water quality, and these policies certainly provide direct support to several of the policies in sec. 2.2 of the PPS. (And, these also provide direct support to lake trout protection under policy 2.1.6). (We should also note that the shorelands of Lakes Simcoe and Couchiching are matters of provincial interest, though located in Ecoregion 6E.)

This conflict needs to be considered and addressed in the document. Perhaps certain mitigation techniques need to be given more emphasis than others, in valued shoreland areas. Surface fuel reduction, for example, though still potentially conflicting with strict shoreland protection policies, is less intrusive than the other vegetation management techniques. As well, structural mitigation techniques could be more emphasized in such areas.

6. If (as already mentioned above) it is not appropriate to designate hazardous forests on OP schedules (sec. 7.2.5), then it is not appropriate to zone these (sec. 7.3). The only exception should be, as part of site-specific zoning where appropriate and as a basis for the kinds of provisions mentioned in sec. 7.3.2. This should be clarified.

We welcome the opportunity to meet with you and your staff to discuss our submission and answer any questions that you may have. To schedule a meeting or for further information, please contact me at 416-668-8469 or by email at l.ryan@ontarioplanners.ca

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Ryan', followed by a horizontal line.

Loretta Ryan, RPP
Director, Public Affairs
Ontario Professional Planners Institute