

## **Region of Niagara, Natural Environment System Plan Comments, Niagara Falls Nature Club**

March 1, 2022

**Objectives and Policies:** The goals of the Natural Heritage System and of the Water Resource System plans are worthy but we have concerns that the plan does not have strong enough wording and enforcement mechanisms to meet these objectives.

**Environmental Impact Statements (EIS):** The current EIS process does not give sufficient protection to our remaining natural areas. The developers who hire consultants to carry out the EIS do not have any incentive to find species at risk or to research how wildlife uses the land. Ecological features are sometimes not reported.

If the Region were to evaluate lands for their ecological and natural heritage value and then clearly denote them as not developable, then developers would know where they could and could not build. This would save time and money for developers, municipalities and would help protect valuable natural assets for the community.

**Buffers:** Buffers should have mandatory minimums both within and without settlement areas. Adjusting the size of buffers through the EIS process leads to downsizing the buffers to a width insufficient to provide any real protection to the natural feature it is adjacent to.

**Wetlands:** We have already lost most of our wetlands and yet the region is proposing to destroy more of them by expanding Merritt Road and constructing ditches along the roads they are building in the wetland complex.

When you surround a wetland with development, that wetland will eventually be degraded or destroyed, yet this is permitted. It should not be.

**Woodlands:** It is more important to preserve our remaining forests than it is to plant trees. Tearing down a forest and then planting some street trees does not make Niagara a greener municipality. It is essential that undergrowth not be cleared from woodlands so that tree saplings can grow and the forest does not die out.

**Peatlands:** Peatlands are irreplaceable, should be protected and it is vital that they not be drained. Existing drains in peatlands should be removed now.

**Shorelines:** We are fortunate to live near two lakes. The shorelines of Lake Erie need to be protected and the dunes planted with beach grasses. Hardening of shorelines is harmful and any development should be set back so that storm damage will not be a

problem. Vegetative borders around streams and rivers should have mandatory buffer widths both in and out of settlement areas.

**Restoration:** Restoring natural areas that have been degraded and connecting them to existing natural features should be part of the plan. When will this be done? How will it be funded? The restoration of lands needs to be managed so that ecological traps do not lead to the loss of even more species. Natural areas cannot effectively fulfill their functions as wildlife habitat and as seed banks for native plants if they are choked with invasive species. Removing invasive species is expensive but necessary.

**Redevelopment:** There are many areas with underused commercial and/ or industrial buildings and large areas of vacant land that could be redeveloped for residential housing and this would spare many of our natural areas.

**Municipal Natural Assets:** The Region of Niagara should conduct an inventory of these assets and catalogue their true value. Once the municipalities and citizens of Niagara are aware of how these nature-based ecosystem features provide services that otherwise would need to be provided by expensive engineered infrastructure, they will see the value of protecting our natural heritage.

In conclusion, we would like to see the plan be less aspirational and more of a roadmap of how to allow for increased population without loss or degradation of our remaining natural areas and features.

Thank you for the opportunity to comment on the Regional plans.

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