



Possibility grows here.

Friends of the Greenbelt Foundation

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Mary-Ann Burns
Senior Planner, Policy
Toronto Region Conservation Authority (TRCA)
101 Exchange Ave, Concord,
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RE: TRCA Consultation on Draft 2 Compensation Protocol May 2017

Dear Mary-Anne,

As you know the Friends of the Greenbelt Foundation works to ensure the permanent integrity of the Greenbelt and its natural and agricultural systems.

Approximately ten million people live within 20km of the Greenbelt. Our research shows that a large proportion of those people benefit from ecological goods and services provided by the protected landscape, from flood control to recreation. While our work focuses on the protection and enhancement of the natural systems within the Greenbelt, we recognize connections to robust and healthy systems beyond the Greenbelt boundaries are essential to its long-term integrity. The TRCA is a key partner in this work, and it is in this context that we offer feedback on the "Draft Compensation Protocol for Loss of Ecosystem Services".

Our comments relating to some specific aspects of the draft protocol are set out below.

1. Introduction

Overall, the Protocol is a much needed and sensible approach to managing the rare instances where planning policies do not adequately protect natural heritage features. Although beyond the scope of the Protocol, we feel strongly that ensuring compensation is only considered as a measure of last resort remains critical. This Protocol should not allow a gradual erosion of natural heritage protection provided by land use planning policies. To this end, comprehensive reporting on all aspects of the protocols implementation should be a firm priority for TRCA.

We commend the TRCA for having an objective of "no net loss of ecosystem services" (pg. 9).

We are concerned that the protocol is not sufficiently ambitious in light of continued losses to the NHS. The introductory text acknowledges that natural features and the functions and services they provide continue to decline. In this context, perhaps the goal should be more ambitious, to generate additional enhancement to mitigate the threats and challenges posed by climate change and increasing urbanization.



The protocol is framed around “loss of ecosystem services” yet its considerations are technically about ecosystem structure and function (as a supply from nature) and not its interaction with human demand which is what generates a “service”.

Ecosystem services are the benefits that flow from nature to humans, so their value is a function of human demand. Therefore, one might expect that the protocol consider human demand when calculating the losses to be compensated.

For example, natural features that are visible / accessible to humans are more valuable than those which are less accessible, so presumably this should be considered in an urban context if and when gains or losses involve accessible parkland.

1.5 Principles of the Protocol

We broadly support the principles outlined but recommend a change relating to instances where ecosystem services are not replaced before losses occur. We believe every effort should be made to ensure continual provision of ecosystem services at the current or higher level wherever possible. In the event that the level of ecosystem services declines as a result of development (and the replacement service not coming ‘online’ in time), compensation should be paid for the time it takes to restore that service, i.e. if compensation is not in effect before the loss of ecosystem services, additional compensation for each year that the service is not available should be required. This ‘lag time’ fee could be used for additional restoration and enhancement projects. The fee can be based on existing estimates for the value of ESS by land cover type. This approach:

- Incentivizes proponents to address compensation from the outset of a project and rapidly replace ecosystem services
- Recognizes the full cost of lost ESS to society
- Supports the goal of increasing ESS provision over time

2.0. Determining Compensation Requirements

Ecological considerations should be the primary driver for determining compensation requirements but a secondary driver could be the social costs of loss of services. This could be based on TRCA’s existing ecological services valuation. We support the proposal that compensation may be on-site or offsite and that the proponent or TRCA may install the compensation. Together, these are important for cost-effectiveness. It is also important the protocol specify that lands secured for compensation should be outside of an existing natural heritage system, to avoid the problem of counting as a gain something that already exists.

However, on page 28, the on-site compensation option says, “If there are no other opportunities for restoration on site, the remaining 2 hectares would need to be restored off-site either by the proponent on other suitable lands they own, or by a transfer of funds to a public agency to complete the restoration elsewhere.” It is not clear why the restoration could not be completed on other lands in private ownership and still be consistent with the goals of the protocol. See 2.3.1 for further comments on risk and uncertainty relating to land in public ownership.



2.1 Replicating the Land Base and Geographic Location

We support the goal of not reducing the overall physical extent of the natural system. However, the 1:1 ratio approach for replicating the land base does not capture the ecological function of the existing lands that are to form the basis for compensation. This will vary from site to site, but unless the land to be acquired for compensation is pure astroturf or an asphalted parking lot, presumably the land would already be providing some “ecosystem structure”.

This existing “structure” should not be ignored in the calculation of compensation and should be considered in the context of not reducing the overall provision of ESS. The metric of ‘compensated stuff’ some multiplication of area and quality and not its addition.

2.3.1 Managing Risk and Uncertainty

It is not clear what the rationale is for stating that newly restored ecosystems are best protected through public ownership. There may be instances where private ownership with a conservation easement on the title offers greater protection. We recommend reconsideration of this measure to include other forms of long-term protection afforded by private ownership.

3. Application of Compensation

The stages set out are appropriate for moving forward with the compensation agreement. An additional account for ‘lost service years’ (outlined in section 1) would be necessary to reflect the addition of this concept to the overall protocol.

4. Administering a Successful Compensation Program

It would be beneficial to acknowledge the importance of public accountability and transparency in the program. The quality of life of local communities is directly affected by the losses and gains of ecosystem services. It is therefore important to establish an effective and open mechanism to update them on the outcomes of the compensation process. TRCA should consider publishing an annual set of natural capital accounts based on their existing ecosystem service valuations to support accountability and transparency. This would include losses and gains of natural cover, and assets (extent of restoration sites) and liabilities (extent of features that will be lost to development).

5. TRCA Strategic Restoration Planning and Implementation Approach

We believe the Restoration Opportunities Database should be publicly accessible and include past successful projects. In addition, we recommend it should be included in an annual ecosystem accounts report. This will help the proponents and the public to understand how natural features are managed over time and the overall success of natural heritage systems restoration. It is important to protect lands identified for restoration activities but not mapped as part of the natural heritage system, if they are to effectively serve as future compensation sites.



This will also assist municipalities in their long-term planning, as official plans will need regular updating to reflect changes resulting from compensation activities.

Sincerely

Kathy Macpherson
Vice President Research and Policy
Friends of the Greenbelt Foundation

