

ONTARIO PROPERTY AND ENVIRONMENTAL RIGHTS ALLIANCE

Unit A, 135 Church Street, North, Mount Forest, Ontario, N0G 1R0

Phone: 519-323-2308 / Fax: 519-323-0266 / E-Mail: opera@bmts.com / Web Page: www.bmts.com/~opera/

CONFIRMATION & OVERVIEW

May 16, 2013

Mr. Marc Rondeau, Director, Species at Risk Branch
Ministry of Natural Resources
300 Water Street, Peterborough, Ontario, K9J 8M5

Dear Mr. Rondeau:

Re: Species at Risk Information

Thanks for your April 23rd letter responding to our March request for additional species at risk information. We're now pleased to briefly comment on each item listed in that response as follows:

1. A total of 445 species are currently said to be at risk in Ontario, a number presumably subject to expansion based on field sightings, solicited or unsolicited, filed from time to time with MNR.
2. Total area of private land on which species at risk reside is 73,868 square kilometers, about 8.25% of Ontario's total land mass (894,639 square kilometers reported in Internet posting).
3. Ivey Foundation on stakeholder panel represents lobbyists who initiated the ESA and thus indeed yields an environmental perspective (a partisan bias that ignores concerns of unrepresented private citizens).
4. The Stakeholder Panel (now disbanded) focused on ESA effective implementation and administrative vigilance but its legislated enforcement and non-compliance penalties were evidently not addressed.

The four Panel sessions were facilitated by Planning Solutions at taxpayer cost of \$6000.00 plus HST but it's not clear how frequently that enterprise is awarded other Queen's Park consulting contracts nor is a previous employee relationship between one of its executives and MNR acknowledged.

ESA 2007 imposes extensive obligations on Ontario citizens who own land located in 8.25% of Ontario's land mass. Different but equally invasive land use rules are dictated in other provincial statutes such as Conservation, Greenbelt (1.8 million acres), Source Water Protection and Places to Grow Acts. How many square kilometers of private property are sterilized by each of these enactments and how many are duplicated under ESA 2007 is not disclosed. Meanwhile, interpretation and enforcement of this layered labyrinth of cross-indexed regulation is perceived to generally rely on bureaucratic whim or impulse.

Once again, please accept OPERA's thanks and appreciation for your cooperation and candor in providing requested details of the Species at Risk Act.

Yours truly

R. A. (Bob) Fowler, Secretary
Ontario Property and Environmental Rights Alliance

c.c. OPERA Members and Supporters

“Seeking government transparency and accountability”