

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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October 31, 2016

Ms. Kim Peters, Strategic Advisor
Ministry of Natural Resources and Forestry
Niagara Escarpment Commission - Georgetown Office
232 Guelph Street
Georgetown Ontario
L7G 4B1

Dear Ms. Peters:

Subject: EBR 012-7228: Amended Niagara Escarpment Plan, 2016 (part of the Coordinated Land Use Planning Review)

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 740 member clubs, we have reviewed the Amended Niagara Escarpment Plan, 2016 (hereafter referred to as the Plan), and recognize the value in having guiding documentation towards the strategic protection of unique and sensitive lands in one of the most highly-populated and utilized regions in Canada. Ensuring this landscape protection will provide long-term food security, ecological and social sustainability, and is an integral part of protecting our environmental rights as Ontarians and Canadians. These lands not only provide food, habitat for wildlife (which include species at risk), and opportunities for recreational and heritage activities, they are also integral to irreplaceable environmental services. We wish to provide the following feedback on areas of particular interest to our organization, our members, and outdoorsmen and women across the province.

General Comments

The Plan has many valuable aspects that the OFAH is encouraged to see included. We support the initiatives to protect landscapes, including waterbodies, habitat and range lands, and agricultural land, and see the value of statements in the Plan that will help reduce the problems caused by urban sprawl. We support, in principle, the Plan's many statements that will protect agriculture and promote food security, protect natural areas and natural resources, promote and protect culture, and recreation and tourism.

The OFAH appreciates the inclusion of fish and wildlife management throughout most of the Plan. That said, the OFAH is concerned about the absence of fish and wildlife management statements under section 1.8-Escarpment Recreation Area. Lakeshore and Crown land, often including most bed and shore of lakes and rivers with some exceptions, are integral for waterfowl hunting and angling. Many of these areas may be out of the Niagara Escarpment Commission jurisdiction, but many lands that may fall within "Escarpment Recreation Area" have historically, and continue to be, utilized for angling and hunting.

The inclusion of angling, hunting, and trapping should also be included in portions of the plan that discuss tourism, culture, and other social and economic considerations. As mentioned in other portions of the coordinated review consultation process these activities have a significant value to a large number of people.

In addition to statements from the other portions of the coordinated review, specific to statements from sections 2.6.1 and 2.7.3 saying "*forest, fisheries and wildlife management*, provided *negative impacts* on the *Escarpment environment* will be minimal," we feel it is important that fish and wildlife management be separated from forest management. Forest management in Southern Ontario is guided by provincial guides, but final management decisions are up to individual landowners. Conversely, fish and wildlife management is already a provincially-managed resource in all of Ontario, and utilization of these resources is determined using evidence-based modelling to ensure sustainability.

ONTARIO FEDERATION OF ANGLERS AND HUNTERS

Ms. Kim Peters
October 31, 2016
Page Two

Our organization is encouraged by the protection of agricultural areas and the principles of food security and environmental stewardship that this includes. Agricultural lands have repeatedly been shown to be excellent areas for ecosystem services like clean water filtration and aquifer recharge with wetlands and soil infiltration; habitat for many plants, animals and insects; and carbon sinks when operated using best management strategies and integrated approaches. Several sections speak to the protection of habitat within agricultural areas, yet there is no direction as to the avenues for how this may be achieved. A statement supporting a cooperative approach towards working with landowners is needed, especially as this approach has the potential to not only ensure food security, but can also help increase environmental services and improve ecosystem health. This approach has been repeatedly successful, as seen with the ALUS Canada programs that are already existent in Ontario, and across Canada, and could be utilized across the entire escarpment.

The Plan has indicated the need to remediate aggregate pits to be compatible with the land uses surrounding. This statement allows for a flexible remediation plan, and could allow for industry and regional regulators to work together to determine remediation approaches, with a functional benchmark in "compatibility." That said, more work needs to be done, as mentioned in other submissions of the coordinated review, to develop and science-based analysis to quantify success. Additionally, remediation of all landscape impacting activities needs to be performed and mandated in all plans in the coordinated review. The OFAH commends the province in the structure of the Plan and hope to see similar structures used in future guiding documents.

Conclusion

In summary, the Amended Niagara Escarpment Plan provides a guide towards the protection of agricultural, natural heritage lands and natural heritage waterbodies that is rooted in logical, evidence-based land management principles. Although fish and wildlife management is stated as a supported activity in many parts of the plan, we feel that it should be expanded into "Recreation Areas," and that the values of angling, hunting, and trapping are highly under-represented as it relates to culture, heritage, social and personal well-being, and tourism. While much is being protected, we believe more can be done towards the remediation of lands that are disturbed through all types of landscape development, including green energy, aggregate, hydro, and others. We also believe the oversimplification of remediation and mediation requirements and of remediation science poses a significant risk to the environmental health, biodiversity, and complex ecosystem structures of native habitats at risk in the Niagara Escarpment.

The OFAH appreciates the opportunity to participate in the review and development of the Amended Niagara Escarpment Conservation Plan that will help ensure a sustainable, healthy Ontario now and for future generations. We look forward to working with the province further on this and any future initiatives.

Yours in Conservation,



Robert Cole
Land Use Policy and Habitat Specialist

RC/gh

cc: Cindy Tan, Manager, Ministry of Municipal Affairs & Housing, Ontario Growth Secretariat
OFAH Board of Directors
OFAH Land Use, Access, Trails Advisory Committee
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