

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: www.ofah.org • Email: ofah@ofah.org

OFAH FILE: 349A/794
October 31, 2016

Ms. Cindy Tan, Manager
Ministry of Municipal Affairs and Housing
Ontario Growth Secretariat
777 Bay Street
Toronto Ontario
M5G 2E5

Dear Ms. Tan:

Subject: EBR 012-7194: Proposed Growth Plan for the Greater Golden Horseshoe, 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 Proposed Growth Plan for the Greater Golden Horseshoe, 2016 (hereafter referred to as the Plan) and recognize the value in having guiding documentation towards the strategic growth of one of the most highly-populated and utilized regions in Canada. Ensuring sustainable growth provides long term ecological and social health and is an integral part of ensuring our environmental rights, as Ontarians and Canadians, is protected. Strategic growth will also maintain our food security and healthy ecosystems, which provide 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 concentrate development and the steps proposed that will help with urban sprawl issues. From statements that will protect agriculture and promote food security, promote the responsible re-use of topsoil and fill, decrease impacts to natural systems through strategic planning and building, and ensure the long-term presence and viability of natural areas and corridors, the Plan has many factors that we support in principle.

While in general we support the plan, we have some questions and comments regarding the following subjects:

4.2.5 – Public Open Space

The OFAH is in full support of the maintenance of publically accessible open spaces, and encourage the utilization of these spaces with as many compatible, ecologically responsible activities as possible. Section 4.2.5.1 c) states "... is based on good land stewardship practices for public and private lands." We feel it is important to consider the use of angling, hunting, and trapping as a management tool, as they are scientifically proven tools for habitat/landscape and wildlife stewardship. These activities are also recognized/protected cultural and heritage activities for both First Nations and every Canadian citizen, and tie into food security, healthy lifestyles, and Canadian identity. While urban fishing initiatives are currently promoted in the Greater Golden Horseshoe, there is no encouragement of hunting. There are multiple examples in Ontario, and other Canadian and international jurisdictions, where urban hunting is used as a method of ecological management, reducing the risk of overgrazing and habitat degradation, and also has many personal and social benefits, including providing fresh high quality food for food banks and soup kitchens in other provincial jurisdictions. The OFAH would like to see the acknowledgement and support of providing urban hunting and angling opportunities within the Plan to enshrine the values and benefits of these activities, and encourage Plan administrators to evaluate the viability of these activities on their lands.

Ms. Cindy Tan
October 31, 2016
Page Two

4.2.6 – Agricultural System

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. Section 4.2.6.6 speaks to strategic planning of agricultural lands and supporting agriculture through promotion, yet there is not a statement acknowledging the necessity of working with the agricultural community for the accomplishment of these goals. 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 already exist in Ontario, and across Canada, and would contribute to the goals of sections 4.2.1 to 4.2.4.

4.2.7 – Cultural Heritage Resources

While this section is predominantly related to specific locations, from early settlement/historically significant buildings to pre-colonization historical First Nations sites, the OFAH feels that this is a limiting definition when looking at Cultural Heritage Resources. Angling and hunting, which are regulated to ensure sustainability, are culturally important historically, and continues to be physically, emotionally, and spiritually beneficial to individuals and many demographics. As these activities that have repeatedly been scientifically shown to be sustainable, humane, and beneficial to quality of life, they must also be protected. Therefore, we feel that this section should be expanded to include activities that have occurred within the entire Greater Golden Horseshoe, not just specific locations.

4.2.8 – Mineral Aggregate Resources

While it is well understood that aggregate resources are a necessary resource for expansion and development, it is very important that lands that are subject to disturbance for the extraction of these resources be remediated to ensure healthy ecosystems, increase agricultural opportunities, and protect natural habitat. Section 4.2.8.1 states "... management of these resources including the identification of opportunities for resource recovery and for coordinated approaches to rehabilitation *where feasible*." While there are levies that go towards the remediation of abandoned sites, the OFAH believes aggregate extraction companies should remediate the sites themselves, subject to provincial guidelines and requirements, guided by professionals in habitat remediation. To avoid the potential for the purposeful abandonment of responsibilities to remediate establishing a security, equivalent to or higher than the cost of hiring a third party to perform remediation, should be in place for aggregate extraction companies at each specific site.

Section 4.2.8.6 goes into detail about the remediation requirements for aggregate pits. In short, this section states that terrestrial areas (total area excluding portions under waterbodies and wetlands) of a remediated pit have 35 percent of the lands as forest cover. While guidelines and requirements are necessary for remediation, the legislative level of the Plan is not an appropriate place to dictate these requirements. These statements, at this level, grossly oversimplifies the complex and intricate science of remediation and reclamation, and completely ignores historical natural heritage. Many areas where aggregate extraction occurs were historically Oak Savannah, Tall Grass Prairie, or Alvar, therefore, the stipulation of "forest cover" is detrimental to some of the most sensitive ecosystems in Ontario. Comprehensive remediation documents need to be developed to ensure remediation, which will not only be applicable to pits and quarries, but all land use types including temporary roads, hydro-line right-of-ways, and solar and wind turbine fields.

Ms. Cindy Tan
October 31, 2016
Page Three

5 – Implementation

While we recognize this plan will require the involvement of all upper and lower tier municipalities, towns and cities, conservation authorities, and multiple ministries, there may need to be more guidance on how it will be implemented in consideration of all legislation that is applicable in this area. Differences between same-level of government organizations operating under the same legislation, instances of different levels of government operating under the same legislation, and instances of same-level government organizations operating under different legislation can all lead to confusion, potential redundancy, potential policy gaps, and oversights that may negatively impact the Greater Golden Horseshoe. The OFAH believes there might be more that can be done to address these issues within the Plan itself, or potentially within other documents, that can help guide regulators and planners in determining how to apply the plan with other legislation.

Conclusion

The Growth Plan for the Greater Golden Horseshoe is an extremely important document towards the long-term sustainable development and distribution of people, goods, and services, while protecting the natural ecosystems, food security, and environmental services. While the sheer number of government bodies and different regulatory levels within the Greater Golden Horseshoe adds a complexity to the planning process the proposed plan has successfully addressed many of the issues facing the area. Yet there are still areas where there can be additional direction and statements to better address concerns, and other areas where issues can be addressed more effectively from either a different or additional document and/or policy.

The OFAH appreciates the opportunity to participate in the review and development of the Proposed Growth Plan for the Greater Golden Horseshoe 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: Kim Peters, Niagara Escarpment Commission, Strategic Advisor, MNR
OFAH Board of Directors
OFAH Land Use/Access/Trails Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff