

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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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 012-7195: Proposed Greenbelt 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 Proposed Greenbelt Plan (2016) (hereafter referred to as the Plan), and recognize the value in having guiding documentation towards the strategic protection of agricultural 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.

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 already exist in Ontario, and across Canada, and could be utilized across the entire Greenbelt.

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

1.2.2.3 – Protected Countryside Goals - Culture, Recreation and Tourism

The OFAH is in full support of the protection of culture, recreation, and tourism. We are encouraged by the section 1.2.2.3 b) as this acknowledges that not only is cultural and heritage represented by physical locations, but also in activities that people do on the landscape, and we are pleased to see that angling is included in the section. The maintenance of publically accessible open spaces, and encouraging the utilization of these spaces for as many compatible, ecologically responsible activities within them is important. Therefore, we feel it is important to include hunting and trapping in this section. These activities are not only recognized/protected cultural and heritage activities for both First Nations and every Canadian citizen, but ties into food security and is an important tool towards the maintenance of healthy ecosystems, and have been shown to be both safe and compatible with other activities on a landscape. The OFAH would like to see hunting and trapping included in this section to enshrine the values and benefits of these activities, and encourage Plan administrators to evaluate the viability of these activities on their lands.

3.3 – Parkland, Open Space and Trail Policies

Much like the previous statement, we feel it is imperative to include angling and hunting in this section. Angling, hunting, and trapping are important cultural and heritage activities that, when managed appropriately, help maintain and increase parkland, and open space quality. Additionally, these activities will increase the health of outdoorsmen and women, and encourage the healthy, naturally connected lifestyle of those who participate in these activities. Therefore, the OFAH feels that there should be inclusive statements for these activities, especially in subsection 3.3.3, to encourage the consideration of allowing hunting, angling, and trapping on municipal land.

4.1 – Non-Agricultural Uses

The protection of agricultural lands should also increase the protection of activities that do not negatively impact agricultural lands, or could potentially improve them. This section speaks to maintaining and supporting recreational and tourism activities. Angling, hunting, and trapping not only provide the benefits suggested above, but also include significant local, provincial, and even national economic stimulus. From the purchase of supplies from local stores during hunting trips, licenses and fees, hotel accommodations, and the purchase of fuel and other goods and services, angling and hunting contributes significantly to the economy. A vibrant, diverse, and strong economy is necessary in order to maintain the viability of the protected countryside, and tourism, including angling and hunting, is an important part of that equation.

4.3.1 Renewable Resources Policies

The OFAH supports the sustainable utilization of landscape renewable resources. Many utilization practices can improve ecosystem health, allow the increase of natural processes, and be used to replicate functions and disturbances that are no longer present in a specific habitat. Examples include forestry imitating fire disturbance and hunting imitating depredation by extinct/extirpated predators. While utilizing many natural renewable resources is beneficial to ecosystems and landscapes, some processes are not. The unfettered installation of infrastructure-heavy renewable energy sources, specifically wind turbines and solar fields, have dramatic impacts on wildlife, habitat, and ecosystem services. While it is important to have energy sources that reduce pollution, current technologies cause significant localized degradation, reduce ecosystem functions/environmental services, and restricts the ecosystems ability to adapt to climate change.

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4.3.2 – Non-Renewable Resource Policies

Section 4.3.2.7 goes into detail about the remediation requirements for aggregate pits in the Natural Heritage System. 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.

Conclusion

The Greenbelt Plan provides a guide towards the protection of agricultural, natural heritage lands, and natural heritage waterbodies. Although fish and wildlife management is stated as a supported activity in section 4.3.1, we feel 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 feel the oversimplification of remediation requirements and of remediation science poses a significant risk to the environmental health, biodiversity, and complex ecosystem structures of native habitats in the Greenbelt.

The OFAH appreciates the opportunity to participate in the review and development of the Proposed Greenbelt 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: Kim Peters, Niagara Escarpment Commission, Strategic Advisor, MNRF
OFAH Board of Directors
OFAH Land Use/Access/Trails Advisory Committee
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