

# 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 012-7197: Proposed Oak Ridges Moraine Conservation 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 Oak Ridges Moraine Conservation 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 angling, hunting, and trapping should also be included in the sections 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.

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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 Oak Ridges Moraine.

The land use and science-based approach of the Oak Ridges Moraine Conservation Plan uses risk-based and evidence-based decision-making and strategy development to create a logical and comprehensive guideline, while still allowing for the required flexibility to allow for localized and case-specific management decisions. This is most evident in requiring remediation for pits, but allowing for industry and regional regulators to work together to determine remediation approaches, and using the sites ability to function, in its intended end land use, as a benchmark indicator. That said, more work needs to be done, as mentioned in other submissions of the coordinated review, to develop a science-based analysis to quantify success, and the expansion of required remediation to all landscape impacting activities. Another specific area of interest is the wording related to recharge and infiltration on landscapes. While it is important to maintain what is currently in place, there should also be efforts to increase the quality and quantity of water recharge in the Oak Ridges Moraine to support the vibrant hydrology and streams of the region. Finally, the table related to setbacks in the document provides values for setbacks that do not take into account many variables including soil type, mechanics, slope, or dominant vegetation type. While it is important to provide these setbacks, it is important to take these variables into account. Therefore, an additional document, which could be incorporated with other remediation activities, should be developed that provides setback distances based on site conditions, and leave variances from these values to be justified by proponents wishing to go within them. The OFAH commends the province in the structure of the Plan, and we hope to see similar structures used in future guiding documents.

### **Conclusion**

In summary, the Oak Ridges Moraine Conservation 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. While fish and wildlife management is stated as a supported activity in many parts of the Plan, we believe 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 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 Oak Ridges Moraine.

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The OFAH appreciates the opportunity to participate in the review and development of the Proposed Oak Ridges Moraine Conservation Plan that help to ensure a sustainable, healthy Ontario now and for future generations. We look forward to working with the province further on this current 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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