

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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March 7, 2018

Protecting Water Consultations
Ministry of Municipal Affairs and Housing
Local Government and Planning Policy Division
Provincial Planning Policy Branch
777 Bay Street
Toronto, Ontario
M5G 2E5

Dear Sir/Madam:

Subject: Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest non-profit, conservation-based organization, representing 100,000 members, subscribers and supporters, including 740 member clubs. We have reviewed the public consultation document entitled "*Protecting Water for Future Generations – Growing the Greenbelt in the Outer Ring*" and provide the following comments for consideration.

The OFAH has supported the Greenbelt and the expansion into Urban River Valleys (URVs), in particular for the benefit of healthy watersheds and recreational angling. Additionally, the OFAH and the Ministry of Natural Resources and Forestry (MNRF), together with many other partners, are collaborating to restore Atlantic Salmon to Lake Ontario and many of its tributaries currently protected by the Greenbelt. This species is an important part of our natural heritage and Ontario's rich biodiversity.

With the multiple perspectives of recreational fishing and hunting opportunities and the benefits of healthy watersheds and agricultural lands, we offer the following comments on the proposed study areas in the outer ring of the Greater Golden Horseshoe (GGH). Where appropriate, we have grouped our responses under multiple questions.

1. Are there additional "building blocks" features that should also be considered for addition to the Greenbelt to protect water?
2. Are there additional data sets or types of analysis that should be considered?
9. Once the Agricultural System and Natural Heritage System under the Growth Plan are finalized, how should they be considered as part of potential Greenbelt Expansion?

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The study areas were predicated on concentrations of water features under development pressure; however, other environmental, recreational, and agricultural values should be considered for the expansion of the Greenbelt. These other values include ecological uniqueness, presence of and threats to species at risk, and the ability for systems to support important coldwater fish species such as Brook Trout. The data for this analysis should be available when the Ontario Ministry of Agriculture, Food and Rural Affairs' Agricultural System and the MNRF's Natural Heritage System are completed and needs to be considered in setting boundaries or adding to the study areas. The Agricultural System analysis, as we understand it, will also assist in the identification of unique or critical agricultural considerations. Through these additional analyses, food security, agri-economics, and biodiversity would then also be considered in this review, representing the outcomes of a protected water supply.

3. Of the seven areas, are there some that are more or less important?

From an Atlantic Salmon restoration perspective, the Orangeville Moraine (Study Area 2) is a groundwater recharge area for the Credit River (one of the targeted tributaries for restoration), and provides critical coldwater baseflow that Atlantic Salmon, and other cold- and cool-water species, depend on. Otherwise, we do not consider any of the areas more or less important than another.

5. Should the province consider adding rivers that flow through urban areas as Urban River Valleys in the Greenbelt?

While we appreciate that the river systems outside the potential Greenbelt expansion area would also be designated as URVs when in settlement areas, this would not protect the connecting reaches outside the Greenbelt and settlement areas; these reaches will be stressed by future development on the landscape. Upstream degradation will negatively impact downstream habitat and water supply, even if that downstream habitat is protected within a Greenbelt designation. As a proactive approach to protecting watersheds, we recommend using the URVs designation, under that name or another appropriate one, for all major rivers (at a minimum) outside the potential Greenbelt.

6. With the range of settlement areas in the GGH, how should the province balance accommodating future urban growth with protecting water resources?

7. What are other key considerations for drawing a potential Greenbelt boundary around settlement areas?

Protecting water resources is vital for the environment and the health of people, as well as the economy. There are also other significant values that should be considered including food security, fishing, hunting and biodiversity. There needs to be firm, focused protection of natural heritage elements.

10. How should other provincial priorities or initiatives, such as mineral aggregates and infrastructure, be reflected in potential Greenbelt expansion?

Other provincial priorities, such as aggregate extraction below the water table, should be considered and reflected in the potential Greenbelt expansion. The distance for the identification and evaluation of natural features that may be negatively impacted by these projects should be assessed to include hydrological units that are functionally linked to one another. This is especially important where the magnitude and type of aggregate extraction activities have the potential to result in considerable and far-reaching ecological impacts, particularly to surface water and groundwater in the surrounding watershed.

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Aggregate resource extraction below the water table should not be permitted unless ecological function has been assessed, and it has been shown there will be no negative impacts to the site itself, or any system(s) beyond the site that have the potential to be impacted. They should be evaluated at broad-scale and detailed levels in order to effectively determine the ecological impacts. In particular, all aggregate projects below the water table must have a thorough examination and impact assessment of how alterations (of any magnitude) will impact fish and fish habitat during and after extraction activities as it relates to:

- Broad-scale fish habitat features and characteristics (lake, pond, river, stream, wetland, etc.);
- Detailed fish habitat features and characteristics (e.g. thermal regimes, spawning habitat, nursery habitat, overwintering habitat, migration routes, etc.); and
- Sensitive or at-risk fish species.

The OFAH recommends that all project proposals (new and expansion) should be reviewed with all other development (past and proposed) that will affect the hydrology within the same watershed to ensure that cumulative effects are adequately considered.

Proper siting of aggregate extraction activities is critically important. It must be recognized that some important pre-development ecological functions cannot be sufficiently rehabilitated. In these locations (e.g. Brook Trout headwaters), aggregate extraction should not be permitted. The OFAH fully supports any program that works toward rehabilitating abandoned aggregate extraction sites. The OFAH recommends that such sites be restored to as natural or enhanced ecological function as possible based on sound baseline data (i.e. attempting to rehabilitate to pre-disturbance ecological function should be a priority). Decommissioning plans should include an assurance fund to carry out decommissioning and rehabilitation activities.

11. What other priorities or initiatives do you think the province should consider?

We have a few additional considerations for the province in the development of Greenbelt spaces in the outer ring of the Greater Golden Horseshoe:

- Regulated hunting is a low-impact, sustainable activity that provides many benefits to wildlife management, people, and ecosystems as a whole. Hunting should continue to be regulated through the Fish and Wildlife Conservation Act and Greenbelt policies should not restrict hunting activities in any way.
- Ontario's wetlands have already been significantly reduced by development, agriculture, and other pressures, and it is questionable whether their ability to provide ecological services for our current water demand is sustainable. Simply protecting wetlands in the face of 50 percent population growth will be woefully insufficient; increasing wetland area and the ecosystem services they provide are an absolute necessity. This needs to be a priority across the province, but should definitely be a priority within the proposed Greenbelt additions. The OFAH is a member of the MNRF's Wetland Conservation Advisory Panel, which is currently developing an offsetting policy to accompany the new Wetland Conservation Strategy. This policy will be an important tool to ensure adequate restoration efforts accompany any development impacts on Ontario's wetlands.
- We noted in the background document areas and natural features whose boundaries went beyond the GGH were cut off at the border of the GGH for the purpose of creating these study areas (the opposite of what was done within the GGH) where roads and municipal boundaries were ignored for the purposes of this exercise. For example, a segment of the Nith River running through Blandford-Blenheim has been excluded because it extends outside of the GGH boundary. Logically, this segment is no less important than the rest of the river. The function of a natural feature does not recognize the political boundaries we impose upon them, and consideration should be given to including natural features across their entire extent.

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- The province's development of the Natural Heritage System plan will help to inform how the impacts of additional development on wildlife habitat and connectivity will be mitigated. The consultation document does not contain any details about the development of the NHS, and we are interested in how "significant" woodlands and habitat will be defined. It would be beneficial to provide additional information and/or a public comment opportunity on the NHS.

The GGH is forecasted to grow and develop significantly over the coming years and with this comes added pressures and demands on our natural resources. Expanding the Greenbelt to include the peripheral "outer ring" within the GGH will assist in the protection of important water resources and other critical ecological features in this area. Moraines, other sand and gravel aquifers, coldwater streams and wetlands, need to be protected to ensure the biodiversity of these areas remains viable to maintain ecological function while harmoniously supporting communities. The OFAH promotes, encourages, and strives to ensure the conservation of Ontario's fish and wildlife, their habitats, and the ecosystems that support them, for the benefit of all Ontarians. In large part, these efforts are to protect and enhance the rich traditions of fishing and hunting. For this reason, expansion of the Greenbelt to include the "outer ring" in the GGH must consider and permit continued sustainable resource use.

Thank you for providing this opportunity for public input.

Yours in Conservation,



Adam Weir
Fisheries Biologist

AW/gh

cc: OFAH Board of Directors
Matt DeMille, OFAH Manager, Fish & Wildlife Services
Mark Ryckman, OFAH Manager of Policy
OFAH Fish & Wildlife Staff