

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 349/794
May 14, 2020

Mr. Jack Van Gemenen
Hearst District Office
613 Front Street
P.O. Box 670
Hearst, Ontario
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Dear Jack:

Subject: ERO #019-1468 – Proposed agricultural land use amendment for Hearst and Kapuskasing

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. We have reviewed the proposed agricultural land use amendment for Hearst and Kapuskasing and offer the following comments for consideration.

The OFAH is supportive of encouraging agriculture; Ontario's food supply depends on a robust agriculture network and individual farms often provide hunters with opportunities to hunt that would not be available to them otherwise. However, the conversion of Crown land to private agricultural land must be done carefully, as it will undoubtedly remove hunting, fishing, and potentially trapping access. This proposal only seeks to allow for the disposition of Crown land in Hearst District and does not identify which areas may be disposed. The OFAH would like the opportunity to continue to provide input once those areas have been identified. We also would like to ensure that the areas chosen have minimal impact to traditional heritage activities. When determining what areas could be eligible, the MNR needs to attempt to avoid existing legal interests, such as land use permits (e.g. registered hunt camps), registered traplines, access points to lakes or rivers, and existing access roads used by anglers, hunters or trappers.

The area that is being proposed for the allowance of agricultural disposition is within Cervid Ecological Zones (CEZ) A and B, and the northern half of the proposed area is in the Pagwachuan caribou range. Both of these CEZs are to be managed to emphasize woodland caribou habitat, as a priority, and minimize impacts to their population. White-tailed deer habitat is not to be emphasized in these areas; however, clearing large areas for agriculture purposes would support deer populations more than caribou. How will clearing Crown land for agriculture be reconciled with the destruction of caribou habitat, given they are a threatened species and habitat in that area is to be managed to support them? The OFAH suggests that when parcels are chosen for disposition, that areas outside of the Pagwachuan range are preferentially chosen in order to reduce potential impacts to caribou populations.

In addition to being caribou range, the majority of the land in the proposal area is unevaluated wetland. Prior to making any decision on disposition of land in this area, the wetlands must be evaluated for significance. The MNR should also map any other key natural heritage features, such as moose aquatic feeding areas in that area, to determine areas to avoid when converting land to agriculture. In a time when Ontario is losing many of its wetlands to climate change and land use changes, the conversion of wetland habitat to agricultural land should be avoided where possible. All ecosystem functions should be assessed prior to determining if a parcel is approved for disposition.

Due to the potential loss of habitat and traditional heritage activities, the disposition of these parcels should be strictly for the improvement of agriculture in Northern Ontario. Will there be a legal requirement for the purchaser to farm the property for a set amount of time? What would stop the owner from buying the property, and then developing it later on? If the parcels prove to be unproductive for the farmers, is the Crown willing to buy the property back for restoration to wildlife habitat, or will those parcels be permanently private?

We appreciate the desire to sustainably develop agriculture and improve Ontario food security in Northern Ontario; however, any proposal that will convert Crown land into agricultural land must undergo an assessment of the ecological, economic, social, and cultural impacts. Allowing for the disposition of Crown land for agriculture inherently comes with a loss of existing sustainable use activities such as fishing, hunting, trapping, and forestry. These activities are incredibly important to the local and regional economy and culture. They rely on available and accessible Crown land; therefore, the potential risk to these activities must be strongly considered when choosing which parcels of land are disposed. If all current land uses and ecological functions are evaluated and taken into consideration when determining what will be converted to agricultural land, then the OFAH does not see an issue with the proposal.

We look forward to offering ongoing feedback when the Province is determining what parcels would be considered for disposition. Thank you for your consideration of our comments and questions.

Yours in Conservation,

A handwritten signature in black ink, appearing to read 'La Tonelli', written in a cursive style.

Lauren Tonelli
Resource Management Specialist

LT/jb

cc: OFAH Board of Directors
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish and Wildlife Services
Mark Ryckman, OFAH Manager, Policy
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