

ONTARIO FEDERATION OF ANGLERS & HUNTERS

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Ontario Conservation Centre

OFAH FILE: 507/794

June 25, 2021

Ms. Liz Mikel
Conservation and Source Protection Branch
Ministry of Environment, Climate Change, and Parks
40 St. Clair Avenue West, 14th Floor
Toronto, Ontario
M4V 1M2

Dear Ms. Mikel:

Subject: ERO 019-2986: Regulatory proposals (Phase 1) under the Conservation Authorities Act

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest non-profit, conservation-based organization representing 100,000 members, subscribers, and supporters, and 725 member clubs. We have reviewed Phase 1 of the regulatory proposals under the Conservation Authorities Act (CAA) and submit the following comments for consideration.

Core Mandatory Programs and Services

The OFAH recognizes the valuable work of Conservation Authorities (CAs) and we have many successful partnerships with CAs as a result. We support the overall objective of the proposed changes to the Act, which is to improve clarity around the programs and services that conservation authorities deliver, specifically with municipal-levied funds. The OFAH is supportive of the definition of mandatory programs and services, including actions related to:

- the risk of natural hazards;
- the conservation and management of lands owned or controlled by the authority;
- the duties, functions and responsibilities as a source protection authority under the Clean Water Act, 2006;
- the duties, functions and responsibilities under other legislation prescribed by regulation; and
- other programs or services prescribed by the regulation within a year of the end of the transition period (including a core watershed-based resource management strategy and provincial water quality and quantity monitoring).

This will give the public, municipalities, and CAs clarity on what the role of the CAs are. As we see more severe climate-induced weather events, natural hazard protection and management will be an essential service to help mitigate the impacts to people, infrastructure, and ecosystems.

The mandate of conservation and management of CA lands is an important role of CAs, especially in Southern Ontario where CAs are responsible for a large portion of undeveloped ecosystems. The OFAH is encouraged to see fish and wildlife monitoring and invasive species management mentioned under the mandatory programs and services associated with managing CA owned lands; however, these activities must not be contained to CA owned lands. These are vital services that CAs deliver to the broader ecosystem that are not being done by many other groups. CAs are the main agency doing stream assessments, which track populations of sensitive species and species at risk (e.g. Redside Dace and Brook Trout). The population information gathered by CAs is important in monitoring the health of our ecosystems, especially in Southern Ontario. Without being able to use municipal funding for stream monitoring off CA properties to build a complete picture of the fish communities or temperature regime, their extremely valuable assessments of stream health will be incomplete. Also, management of invasive species is essential in preventing their spread and costly management/eradication efforts. By only permitting CAs to manage invasive species on their properties and not assist with surrounding invasive species management, the problem will persist, and invasive species will continue to spread – costing the municipality money in the long run. Allowing these activities to be funded through municipal levies will ensure that this critical work can continue without issue.

Access and the infrastructure that supports public access to CAs should fall under core mandated programs and services. This is extremely important for passive use areas that do not charge for access as they will not have CA gathered revenue to maintain access points such as parking lots, trails, and boat launches. By not allowing CAs to use municipal levied funds to maintain and improve passive use properties, there is a risk that CAs would have to close those properties to the public. Access to greenspaces is very important for the mental and physical health of Ontarians, which was highlighted by the dramatic increase of visitors during the pandemic. Restricting access to these greenspaces, especially in Southern Ontario where options are limited, would be a huge disservice to the public. Exposure to the outdoors is essential in teaching individuals the importance of protecting and maintaining natural habitats and biodiversity, and CAs play a critical role in access to those opportunities.

The OFAH recommends that CAs recognize the existing conservation tools of regulated hunting, fishing, and trapping in all management planning, and explore ways to enhance opportunities for these activities on CA lands. We believe that these conservation tools fit within the mandate of managing CA owned lands. However, there are many CAs where fishing, hunting, and trapping opportunities have been restricted on all or some of their properties without providing compelling evidence as to why these activities are not compatible with other uses. CAs have an opportunity to benefit from these traditional heritage activities on their lands by increasing the number and diversity of recreational opportunities, better engage local residents, protect ecological integrity, and generate a multitude of socio-economic benefits. Like fishing and hunting, training and trialing for sporting dogs is a low impact activity that could be permitted on many CA lands. Training and trialing would simply require open space to allow sporting dogs to learn essential skills to track and pursue game animals. With many examples of areas that safely and respectfully allow multiple uses like angling, hunting, and training and trialing of dogs in Ontario, there are many options available to continue these opportunities in areas that don't currently have them. In addition to the already established benefits of permitting these activities, they could also provide additional revenue to the CA that could then be used for non-mandatory programs. We look forward to working with the government and CAs to ensure that these important heritage activities can continue to contribute to the sustainable management of natural resources on CA properties.

Non-mandatory Programs and Services

By requiring CAs to enter into contracts with municipalities for funding of non-mandatory programs or services, there will likely be a decrease in the number of these programs and services that can continue. Municipalities have their own budgetary concerns to focus on, so entering into additional funding agreements with their CA will likely not occur, preventing important work from being conducted. These non-mandatory services include outreach and education programs that promote the importance of conservation of natural resources to future generations. These are often programs and services that are not available or underfunded through other agencies, but are critically important to the continued health of the ecosystem and for fostering community stewardship. The OFAH is concerned that this funding change could exasperate the existing disparities between CAs funded by smaller municipalities and those funded through large municipalities with large tax bases (e.g., Toronto Region Conservation Authority). These funding and capacity disparities may be amplified for CAs that work with smaller municipalities as they will be less likely to get funding for “non-mandatory” activities. With smaller budgets in general, these municipalities will not be able to fund additional CA activities. This issue could be compound as the CAs that already have limited infrastructure due to smaller tax bases will not be able to raise their own money to fund non-mandatory programs themselves. The MECP should consider ways to allow for underfunded CAs to receive funding for non-mandatory programs.

Section 29 Minister’s Regulation

The OFAH is supportive of the consolidation of the current individual ‘Conservation Areas’ regulations regarding activities on lands owned by CAs into one regulation, as long as it does not have any negative impact on the existing regulations. These regulations set out activities requiring permits, including hunting, and the cost of those permits. By listing them all in one location it will be easier to determine exactly which CA has hunting permits and their cost. As mentioned above, we encourage CAs to consider how hunting can be better utilized on their properties as both an ecological service, but also a revenue generator.

Conclusion

The OFAH appreciates the opportunity to submit comments on the proposed changes to the Conservation Authority Act and hopes to be further involved in discussing how CAs can better manage their properties and increase opportunities for conservation activities.

Yours in Conservation,



Lauren Tonelli
Resource Management Specialist

LT/jb

cc: OFAH Board of Directors
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