



Ontario Federation of Agriculture

Ontario AgriCentre

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September 29, 2017

Ms. Ala Boyd
Manager – Natural Heritage Section
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, ON
K9J 8M5

Dear Ms. Boyd;

RE: EBR 013-1014 Criteria, methods and mapping of the proposed regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

We view holding only three public open house sessions across the entire Growth Plan for the Greater Golden Horseshoe area as utterly inadequate and unacceptable. Too many farmers and other rural property owners found themselves shut out of these sessions. There was little to no promotion of the sessions. Holding only three sessions across such a large area limited the ability of farmers and other rural property owners to attend. Holding them during the busy summer farming season further limited participation. OFA believes that the government should have scheduled additional sessions to better reflect the geographic breadth and diversity of the Greater Golden Horseshoe area.

- **Generally, do you agree with the principles? Are there other key principles?**

The Ontario Federation of Agriculture generally agrees with most of the principles listed in section 5.0 of the Summary of Criteria and Methods. However, we do have strong reservations with some specific principles; namely consistency with current provincial NHS planning criteria and guidance, linkage criteria and public access to mapping.

We also question the rationale behind publishing two background papers; a Summary of Criteria and Methods paper and a more-lengthy Technical Report on Criteria, Rationale and Methods paper. Although the more-lengthy paper is cited in the Summary of Criteria and Methods paper, no direct link to it is provided, such as the name, telephone number and email of the MNRF contact. The presence of two papers is confusing. OFA firmly believes that all parties to this process would have been better served by one comprehensive discussion paper.

The third principle speaks to “consistency with current provincial NHS planning criteria and guidance (e.g. Natural Heritage Reference Manual and Greenbelt Natural Heritage System) being

maintained”. We believe that the Summary of Criteria and Methods totally fails to fulfil this principle. While the Natural Heritage Reference Manual clearly and unequivocally states that “it is a common and often appropriate municipal practice to use an **overlay approach** in the official plan to identify natural heritage systems, features and areas within Ontario’s agricultural system designated as prime agricultural areas.” Then the Natural Heritage Reference Manual goes on to note that farmland in a rural area functions as a linkage between natural features, or at least do not impede the movement of many species. This farmland should be included as farmland with the proposed natural heritage system being an overlay on lands designated for agricultural uses. This designation of agricultural land and natural heritage features, with linkages between natural heritage features as an **overlay** would remain for as long as the agricultural use remains. As an overlay, the linkages and corridors do not constrain or limit ongoing agricultural activities. They do not limit the full range of agricultural uses from being exercised, including the construction of agricultural buildings not located in or immediately adjacent to natural heritage features. The Summary of Criteria and Methods totally ignores this guidance. The OFA views this oversight as unacceptable. Both the Summary of Criteria and Methods and the Technical Report on Criteria, Rationale and Methods papers must be rewritten to correct this oversight.

The list of principles omits two principles which we view as critical to the successful implementation of the proposed regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe; a commitment to verification and ground-truthing of proposed natural heritage features and implementation procedures.

All too often, the means used to identify possible natural heritage features on the landscape, air photos and satellite imagery, are routinely misinterpreted. What appears to be forest cover is an orchard, Christmas tree farm, tree nursery or tree plantation. Wet patches of ground and irrigation ponds are deemed to be wetlands. We’re told that “corrections” can be made at the Official Plan revision stage. In OFA’s opinion, that is too late. The information proposed to delineate natural heritage features on the landscape needs to be verified and ground-truthed before it is passed onto municipalities for implementation. We are not prepared to trust that all municipalities within the Growth Plan for the Greater Golden Horseshoe will be open and agreeable to correcting natural heritage mapping errors. The Ministry of Natural Resources and Forestry has been tasked with identifying and mapping a regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe. We see ensuring that the identified features are accurate as solely MNRF’s responsibility.

The Ministry’s materials do not contain any details or directions on how the proposed regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe will be implemented at the municipal level. We contrast this with the Ministry of Agriculture, Food and Rural Affairs, which has posted its extensive Implementation Procedures paper on the Environmental Bill of Rights Registry for public comment, as part of its Agricultural System for the Great Golden Horseshoe posting. MNRF must develop and distribute implementation guidelines that emphasize that the linkages and corridors between natural heritage features are simply overlays on agricultural lands, and only become a reality when the agricultural lands are permanently removed from agricultural use through rezoning to some non-agricultural land use. Furthermore, the full range of “agricultural uses”, as defined in the Growth Plan for the Greater Golden Horseshoe, 2017 are permitted, with no added requirements to complete an Environmental Impact Study, or natural heritage evaluation, as a condition of approval for the expansion of an existing farm building, or the construction of a new farm building, even within a linkage or corridor. The Ontario Federation of Agriculture strongly recommends that the Ministry of Natural Resources and Forestry extend the due date for this EBR posting to enable the Ministry to develop and consult on these implementation procedures.

- **Do you agree with the criteria for the composition and size of core areas and linkages?**

We generally concur with the criteria for the composition and size of the core areas.

With respect to the linkages, we categorically disagree with the criteria and size of linkages. A 500-metre-wide corridor (or 1640 ft.) could easily cover the entire width of a 100-acre farm, and bears no relationship to the size of the natural heritage features themselves. Linkages should reflect the size of the features they connect. From our read of MNRF's Natural Heritage Reference Manual, a 500-metre-wide is the largest width cited on page 29. In our opinion, to default to the largest width is unscientific and indefensible. The Ontario Federation of Agriculture strongly recommends that linkage widths reflect the local landscape and the species likely to use the linkage, and that linkage or corridor widths should be no wider than the width of the features and areas they are connecting.

- **Do you agree that there should be consideration of smaller core areas to acknowledge highly fragmented areas with limited natural cover?**

No, the OFA does not agree that smaller core areas should be given consideration like the proposed size thresholds.

- **Do you agree with the automated approach to consistently apply the criteria across the landscape?**

OFA's expectation is that the criteria and methods will be consistently applied across the landscape. To do otherwise would be discriminatory, and defeat the purpose of defining and mapping a Regional Natural Heritage System for the Greater Golden Horseshoe.

- **Do you have other suggestions for the Ministry of Natural Resources and Forestry to consider?**

Agricultural uses in Ontario encompasses the growing of a broad range of crops and raising a broad range of livestock and poultry. Taken in its totality, Ontario's agriculture sector is among the most diverse across all of North America, with well over 200 commodities produced. Farmers raise Christmas trees, plant orchards for fruit and nut production, grow trees as nursery stock and even plant tree plantations for biomass or timber. To date, we have no assurance that these activities will be clearly and unequivocally viewed as agricultural uses, and not subject to natural heritage protection policies. The Natural Heritage System policies and implementation procedures must recognize and accommodate the full range of agricultural uses.

MNRF must be able to offer individual landowners, whose property may include some components of the proposed NHS, with the ability to view NH features, areas and linkages that apply to their specific properties. Furthermore, there must be a commitment to verify that the features believed to occur, actually do exist. Too often in the past we've encountered active, productive portions of farms that have been misinterpreted, and then wrongly designated, as a natural heritage feature. If a feature has been wrongly designated, we fully expect MNRF to take the lead on correcting a wrongly-applied designation. Neither the individual landowner, nor their municipality, should bear the responsible for correctly MNRF's mapping.

There are several references to future and potential restoration of habitat patches. Given Ontario's small and declining agricultural land base, suggestions or inferences about habitat restoration are not welcomed. Currently, less than 5% of Ontario's land mass can support agricultural production;

producing food, fibre and fuel. Agricultural lands should be preserved to produce food, etc. The OFA categorically asserts that natural heritage restoration is not the best use of our agricultural lands.

Language under “Linkage Criteria” on page 12 of the Technical Report on Criteria, Rationale and Methods paper makes direct mention of linkages providing “several benefits to humans (open spaces for recreation, limits on urban sprawl and ecosystem services). Nowhere does it mention that privately owned lands dominate the property fabric across the Greater Golden Horseshoe, and not available to the public as open spaces for recreation unless expressly permitted by the property’s owner.

Implementation at the municipal level is key to the success of a Regional Natural Heritage System for the Greater Golden Horseshoe. Municipal planners and politicians must be informed that the proposed natural heritage system, particularly the linkages and corridors, are an overlay and only become a reality when the municipality is considering a development application or rezoning that would permanently remove lands from an agricultural designation.

The Growth Plan for the Greater Golden Horseshoe, 2017 defines an agricultural system in part as, “an agricultural land base comprised of prime agricultural areas (Class 1-3 soils), including specialty crop areas, and rural lands (Class 4-7 soils) that together create a continuous productive land base for agriculture”. From the discussion papers, it is not clear how does MNRF intends to address those rural lands that are an active, productive part of the overall agricultural land base. Clearly, when part of the overall agricultural land base they should be considered as part of the overall agricultural land base and not part of the natural heritage system. The OFA strongly recommends that rural lands that are an active, productive part of the overall agricultural land base be considered as part of the overall agricultural land base and not part of the natural heritage system.

The proposed Criteria, methods and mapping of the proposed regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe lacks any recognition that Ontario’s agricultural areas not only provide us with safe, affordable food, fibre and fuel, but also a broad range of environmental and ecological goods and services that benefit all Ontarians. These services, in alphabetical order, include;

- aesthetic and recreational space,
- air quality (carbon sequestration, climate regulation, oxygen production),
- biodiversity,
- nutrient cycling,
- pollinator habitat,
- soil erosion control, and
- water cycling (flood mitigation, groundwater recharge, purification, retention).

This continued oversight of the broad range of environmental and ecological goods and services provided by actively farmed agricultural lands is troubling. OFA strongly encourages the Ministry of Natural Resources and Forestry to include language outlining the environmental and ecological goods and services provided by actively farmed agricultural lands in the proposed Criteria, methods and mapping of the proposed regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe.

At least one municipality in the Greater Golden Horseshoe area has applied a natural heritage designation to a combination of natural heritage features and areas as well as the intervening agricultural lands. This use of a natural heritage designation is, in our opinion, utterly wrong, and one that should not have been permitted. Therefore, the OFA strongly recommends that this

misuse of the natural heritage designation be reversed at the time of the municipality's next Official Plan review or conformity exercise, restoring an "agricultural" designation to lands being used for agriculture.

The OFA welcomes this opportunity to provide its comments and recommendations on the Criteria, methods and mapping of the proposed regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe. We anticipate the incorporation of our comments and recommendations into the document's final version.

Sincerely,



Keith Currie
President

KC/pj

cc: Hon. Kathryn McGarry; Minister of Natural Resources and Forestry
Hon. Jeff Leal; Minister of Agriculture, Food and Rural Affairs
Hon. Bill Mauro; Minister of Municipal Affairs
OFA Board of Directors