

March 11, 2022

Jessica Isaac, Senior Policy Advisor
Environmental Policy Branch
40 St Clair Avenue West, 10th Floor
Toronto, ON M4V 1M2

Submitted via email: mecp.landpolicy@ontario.ca
and submitted online via Environmental Registry of Ontario (ERO)

Dear Jessica Isaac,

RE: ERO #019-4978: Subwatershed Planning Guide

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA appreciates this opportunity to provide input to ERO #019-4978: Subwatershed Planning Guide.

We appreciate the role that subwatershed plans play in informing the land use planning process. Land use planning requires the wise use and management of our land resources, and uses the Provincial Policy Statements to guide the balancing of these interests. We believe that this document should directly reference the importance of the balancing of these interests, particularly the need for our land to provide for the production of food and fibre. It may be appropriate to include this in Section 1.6 Policy Context of the “Subwatershed Planning Guide”. Furthermore, we would like to stress that this process does not impact the ability of Normal Farm Practices to continue.

Given that there have historically been differing interpretations of what constitutes a “wetland”, we recommend that the Subwatershed Planning Guide clearly adopt the definition included in the Provincial Policy Statements. Specifically:

Wetlands: means lands that are seasonally or permanently covered by shallow water, as well as lands where the water table is close to or at the surface. In either case the presence of abundant water has caused the formation of hydric soils and has favoured the dominance of either hydrophytic plants or water tolerant plants. The four major types of wetlands are swamps, marshes, bogs and fens.

Periodically soaked or wet lands being used for agricultural purposes which no longer exhibit wetland characteristics are not considered to be wetlands for the purposes of this definition

Finally, it is essential that subwatershed planning process include groundtruthing to ensure the accuracy of the information within the final plan. The information contained within this plan will provide the basis for many decisions. It must be absolutely accurate – it cannot rely on later steps in the planning process. Groundtruthing must include input from landowners who are much better suited at describing the features and functions on their land.

I trust our opinions and recommendations will be given due consideration in this consultation.

Sincerely,


Peggy Brekveld
President

cc: The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs
OFA Board of Directors