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642 Woolwich Street,

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October 4, 2017

Ala Boyd,
Manager, Natural Heritage Section
Ministry of Natural Resources and Forestry
Policy Division
Natural Resources Conservation Policy Branch
300 Water St.
Peterborough, ON
K9J 8M5

Dear Ala Boyd,

RE: EBR 013-1014 Criteria, Methods and Mapping of the Proposed Regional Natural Heritage System for the Growth Plan and the Greater Golden Horseshoe

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario.

The Greater Golden Horseshoe is home to a significant portion of Ontario's best farmland. This needs to be protected for farming in the long term. This farmland, aside from its economic and social importance, is also environmentally significant, providing important environmental goods and services and connecting important natural heritage and hydrologic features.

Key Recommendation: The CFFO would like to see a clear outline of a local consultation and refinement process included in the criteria and methods for Natural Heritage System mapping. The principles and automated approach, while a good starting point, do not allow for appropriate consultation at a local level or for on-the-ground verification of the proposed map.

The outlined principles form a reasonable basis for methods to develop a draft map as a starting point. They do not, however, provide sufficient basis for regional consultation and refinement of the map based on on-the-ground verification and local knowledge. This needs to be added to the overall principles and process of creating the final map of the Natural Heritage System.

The criteria outlined do recognize that different minimum requirements for core areas in more fragmented regions are required. Other regional differences may also need to be considered through a local consultation process to refine the mapping. This

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consultation process should involve local landowners, local governance, and other local stakeholder groups.

Likewise, the automated approach used is a good guide and starting point, but it will need to be refined through on-the-ground verification, consultation with landowners, and other sources of local knowledge of the landscape, both physical and social, that may not be reflected fully in the data sources used to automatically generate the map.

Key Recommendation: That normal farming practices are fully permitted on farmland within the Natural Heritage System mapped area. Within and around these areas, where farmers are motivated, there should be support for best management practices through extension to farmers and funding incentives to facilitate entrepreneurial efforts to make voluntary stewardship improvements.

The approach taken in the land use plans within the Greater Golden Horseshoe area of having an agricultural land base demarcated as a designation and a Natural Heritage System as an overlay indicates recognition that farmland and natural heritage features need not be mutually exclusive. The “Implementation Procedures for the Agricultural System in Ontario’s Greater Golden Horseshoe” recognizes that “farms often provide ecological goods and services, and natural heritage and water resource systems in turn provide benefits to farms” (p. 22).

It is important that the underlying permitted uses of normal farming practices are able to continue within those areas where farmland and the Natural Heritage System interact.

At the same time, there should be appropriate support available for farmers who wish to make voluntary improvements on their farms. We recommend extension staff who can provide expertise to farmers on the particular situation of their farms, accompanied by funding incentives to help farmers make changes. This method has proven to be highly effective in promoting on-farm stewardship.

We appreciate this opportunity to respond to this proposed Natural Heritage System map, methods and criteria. Thank you for consideration of our comments.

Sincerely,

Clarence Nywening, President
Christian Farmers Federation of Ontario