

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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OFAH FILE: 794  
April 22, 2022

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To Whom it May Concern:

Subject: ERO # 019-4803 Ideas for adding more Urban River Valleys

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 proposal for adding more Urban River Valleys (URVs) as well as the two related ERO postings, *ERO # 019-4485 Proposed Amendment to the Greenbelt Plan - Growing the size of the Greenbelt* and *ERO # 019-4483 Proposed Amendment to the Greenbelt Area boundary regulation - Growing the size of the Greenbelt* and offer the following comments for consideration.

The OFAH recognizes the importance of protecting URVs and agrees with the proposal to add more waterways into the Greenbelt. The Greenbelt was established to dictate where urbanization could not occur in order to preserve the little habitat that remained in the area. With a growing population and increasing urbanization, it is critical that natural areas and features are preserved now more than ever. The protection of the waterways within the Greenbelt is essential for clean drinking water, flood protection, and healthy ecosystems. The URVs and the waterways connected to them are headwaters for Lake Ontario, so ensuring that they are protected also provides value to the health of Lake Ontario. These waterways not only provide critical ecological services to the surrounding area, but they also have important social value. They provide areas to fish and greenspaces to be able to enjoy nature in a highly urban area. These areas need to be protected from further urbanization to increase biodiversity and provide flood protection.

The OFAH is specifically supportive of the idea of expanding the use of URVs through the addition of the tributaries of any existing URV. Connectivity is an extremely important part of stream and river health, and tributaries can have significant impacts on the temperature, sediment load, and pollutants of the main waterways. As such, the OFAH would like to see URVs extended not only to the tributaries but the small, sub-tributaries of the already protected main waterways. If the smaller sub-tributaries are not afforded the same level of protection as the larger tributaries and waterways, there will continue to be risk to the watershed as a whole. The tributaries and sub-tributaries of all URVs should be offered default protections unless there is a defensible reason to exempt them. The OFAH is also supportive of the addition of publicly owned land parcels to existing URVs where it makes sense to do so. Protecting the lands around these critical waterways helps to reduce potential impacts to the URVs. The addition of both tributaries and publicly owned land parcels are simple additions that could have extremely positive impacts on the health and protection of the primary waterway.

The OFAH administers the Lake Ontario Atlantic Salmon Restoration Program (LOASRP) which works to restore Atlantic Salmon populations in Lake Ontario. As part of this program, we work towards habitat and water quality enhancements in the watersheds targeted for Atlantic Salmon restoration. This includes improving riparian zones, decreasing sedimentation, and increasing connectivity. Many of the streams that have been selected or are potential targets of restoration and/or stocking are located within the Greenbelt and are already listed as URVs. As such, we are supportive of the proposal to add 13 new URV areas, considering some of the additions are of specific interest to the LOASRP (expansion of the Wilmot Creek and Humber River URV).

Overall, the OFAH is supportive of the three proposals to increase the Greenbelt through additional URVs, but we believe that more could be done. The waterways in that area provide critically important aquatic habitat and feed into coastal wetlands that are essential for climate resiliency. The protections afforded under the URV classification will provide these waterways with enhanced resiliency to the stressors of climate change that they are currently being faced with and will see more of in the future. The OFAH would like to see an increase in protections for these waterways through the further expansion of URVs. Thank you for considering our comments.

Yours in Conservation,

A handwritten signature in black ink, appearing to read "Lauren Tonelli". The signature is fluid and cursive, with the first name "Lauren" written in a larger, more prominent script than the last name "Tonelli".

Lauren Tonelli  
Resource Management Specialist

LT/jb

cc: OFAH Board of Directors  
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