



June 5, 2014

Michelle Collins
Policy Analyst
Ministry of Natural Resources
Policy Division, Species at Risk Branch
300 Water Street
Robinson Place South Tower
Peterborough, Ont K9J 8M5

Ms. Collins:

Re: Conservation Ontario's Comments on the "Development of the government response statement for Bobolink and Eastern Meadowlark under the *Endangered Species Act, 2007*" (EBR# 012-1597)

Conservation Ontario is the network of Ontario's 36 Conservation Authorities (CAs). Conservation Authorities identify local concerns and create solutions to protect and enhance the local environment. Conservation Authorities across the province have been engaged with many partners including farmers and rural landowners in the development of strategies and implementation of actions that include the protection and restoration of habitats for species at risk.

Conservation Ontario appreciates the opportunity to provide comment on how the government should consider the recommendations from the Bobolink and Eastern Meadowlark Round Table Report in the development of the government response statement. The response is organized around the key questions to facilitate public input posed by the Ministry.

Question 1: Do you support the exemption solutions package proposed in the report, which would include extending the agricultural exemption until 2024 as well as stewardship incentives for landowners, research and monitoring, and education and outreach?

Conservation Ontario is supportive in principle of the proposed exemption solutions package proposed in the report, which would include extending the agricultural exemption until 2024 as well as stewardship incentives, research and monitoring, and education and outreach. As part of the continued exemption for agricultural activities, Conservation Ontario requests that the Ministry should explicitly include tree planting activities as part of the "silvicultural operation" exemption.

Prior to establishing a ten year exemption for agricultural activities, it would be beneficial to understand what has been accomplished during the current 3-year transitional exemption period in terms of impacts (positive or negative) to the agricultural community and to Bobolink and Eastern Meadowlark

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populations. Specifically, were the goals and objectives of the 3-year transitional period achieved? If not, is it expected that they will be achieved through an additional extension? The above information, coupled with the Round Table recommendations and public comment over the proposed 14-month exemption extension should be utilized to determine whether or not a ten year extension is appropriate.

Conservation Ontario supports the nine principles proposed in Round Table Recommendation #3.3. The “Supported” principles should be expanded to offer on-the-ground technical expertise and support to farmers and other landowners. Conservation Ontario is encouraging of funding for stewardship incentives towards the management and restoration of habitats that address the conservation of biodiversity, including habitats for species at risk, like Eastern Meadowlark and Bobolink. The Ministry could provide this service directly for farmers and other landowners, or offer training to Conservation Authority staff to advance their skills and capacity to recommend/implement habitat improvement projects on rural properties.

Conservation Ontario is also strongly supportive of Safe Harbour agreements and recommends that they be considered as an essential component of a permanent solutions package with application to voluntary restoration projects undertaken to attract or enhance species at risk habitat. The development of umbrella Safe Harbour agreements (Recommendation #5.2) for stewardship organizations has particular relevance to CA business.

Finally, the report is unclear when it refers to “the need to raise awareness among... Conservation Authorities” as to what action they are proposing. Further explanation is required in order to evaluate this suggestion.

Question 2: Are there any components of the solutions package that are more or less important than others?

Conservation Ontario views education and the establishment of incentive programs for farmers and non-farmers to be of critical importance.

Question 3: How can all landowners be encouraged to take part in recovery?

Education and stewardship initiatives that introduce people to the ecological importance of grassland habitats may be an effective way to encourage landowners to take part in the recovery of the Bobolink and Eastern Meadowlark. There is a role for stewardship groups, including Conservation Authorities, in establishing grassland habitat in areas which historically would have supported non-forest communities. Planting of grassland species and removing invasive plant species at appropriate locations for grassland enhancement could be an important first step. In order to encourage the maintenance/re-establishment of grassland habitat, these types of habitat should be considered when developing incentive programs.

Question 4: What existing or new strategies and plans could be harnessed to conserve suitable grassland, hay, and pasture habitat in Ontario?

To assist with the recovery of grassland birds in the Credit River Watershed, Credit Valley Conservation will soon be launching a local Bird-Friendly Certified Hay Program. This program is a voluntary two-year pilot project that aims to assist in the recovery of Bobolink and Eastern Meadowlark by providing improved habitat quality and by reducing nest damage and juvenile and adult mortality within hay fields caused by farm machinery. The objectives of the Program are achieved by delaying harvesting operations until after

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juvenile grassland birds have fledged the nest. Central to the Program is an online marketplace that connects hay growers/sellers with hay purchasers for the purpose of establishing hay sale agreements. In addition, the online marketplace will allow landowners with farmland available to rent to connect with hay growers seeking lands to grow Bird-Friendly Certified Hay on to establish land rental agreements. To access the online marketplace go to www.birdfriendlyhay.ca . If this program is found to be successful at improving the extent and quality of habitat for Bobolink and Eastern Meadowlark in the Credit River watershed, Credit Valley Conservation would be interested in discussing with the Ministry the expansion of the program to other regions of Ontario.

In addition, it is recommended that Conservation Authorities be considered as key partners (e.g. through the advisory committee) in grassland bird recovery planning and efforts. Conservation Authorities are in a position to implement many of the goals outlined in the Recovery Strategy, including stewardship with the agricultural community and rural non-farm landowners, land acquisition, and habitat restoration and stewardship on existing Conservation Authority lands.

Once again, thank you for the opportunity to provide comment on the "Development of the government response statement for Bobolink and Eastern Meadowlark under the *Endangered Species Act, 2007*". Should you have any questions, please contact me at extension 226.

Sincerely,



Leslie Rich
Policy and Planning Officer