



June 5, 2014

Sue Russell
Policy Analyst
Ministry of Natural Resources
Policy Division, Species at Risk Branch
300 Water Street
Robinson Place South Tower
Peterborough, ON K9J 8M5

Ms. Russell:

Re: Conservation Ontario's Comments on the "Amendment of Ontario Regulation 197/11 made under the *Endangered Species Act, 2007*" with regard to agricultural operations and Bobolink and Eastern Meadowlark (EBR# 012-1596)

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 supports the proposed amendment to Ontario Regulation 197/11, which would continue the exemption for agricultural operations in relation to Bobolink and Eastern Meadowlark for an interim period of 14 months. It is appropriate for the existing exemption to continue to allow time for the Ministry to consider the recommendations of the Bobolink-Eastern Meadowlark Round Table Report, public comments related to the report and to prepare a government response statement.

The Bobolink and Eastern Meadowlark rely heavily on human created grasslands. Working with the farm community for over 60 years, Conservation Ontario is appreciative of the position farmers have been placed in as a result of these birds being designated as threatened. CAs are also working with the farming community to come up with innovative solutions. CVC 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

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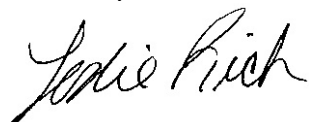
providing improved habitat quality and by reducing nest damage and juvenile and adult mortality within hay fields caused by farm machinery. The objectives of the Program are achieved by delaying harvesting operations until after juvenile grassland birds have fledged the nest.

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 or to establish land rental agreements. To access the online marketplace go to www.birdfriendlyhay.ca. The effectiveness of the pilot for this innovative stewardship tool for Bobolink and Eastern Meadowlark recovery will be jeopardized if the October 31, 2014 agricultural exemption is not extended.

As part of the continued exemption for agricultural activities, Conservation Ontario recommends that the Ministry should clarify that the term "silvicultural operation" also applies to tree planting activities. Except in areas which historically would have supported non-forest communities, it would require continued human manipulation of habitats to prevent regeneration. Therefore tree planting should not be limited in those areas where forest habitat regeneration would naturally occur.

Thank you for the opportunity to provide comment on the proposed "Amendment of Ontario Regulation 197/11 made under the *Endangered Species Act, 2007*" with regard to agricultural operations and Bobolink and Eastern Meadowlark. Should you have any questions, please contact myself at extension 226.

Sincerely,



Leslie Rich
Policy and Planning Officer