

May 13, 2011

Jeremy Downe Senior Policy Advisor Ministry of Natural Resources Policy Division, Species at Risk Branch 300 Water St. Floor 2, Robinson Place South Tower Peterborough, Ontario K9J 8M5

Dear Mr. Downe:

Re: EBR Registry Number 011-2901 Amendment to the Ontario Regulation 242/08 (General) under the Endangered Species Act, 2007 (ESA) respecting Bobolink and establishment of an advisory group to support the development of a long term approach to Bobolink recovery

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.

On behalf of Conservation Ontario, the network of 36 Conservation Authorities, I would like to commend the Ministry of Natural Resources for proposing the amendments to the *Ontario Regulation* 242/08(General) under the Endangered Species Act, 2007 (ESA) respecting Bobolink and the establishment of an advisory group to support the development of a long term approach to Bobolink recovery.

The bobolink relies heavily on human created grasslands like hayfields and pasturelands found in cattle and other livestock operations in Ontario and across its breeding range. 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 the designation of bobolink as Threatened. With the recent difficulties in the cattle industry and the abandonment of farms, farmers are integral to developing and implementing solutions to halting or reversing the decline in this species as well as other significant species, habitats and natural heritage features that contribute to healthy watershed systems and biodiversity.

In this case, Conservation Ontario is supportive of the proposed changes that would give farmers a three-year exemption from Endangered Species Act requirements on haying or pasture lands allowing them to continue their operations while a longer term approach is developed to protect bobolinks and

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their habitat.

Conservation Ontario is also supportive 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 bobolink. The establishment of applied research pilot projects and targeted outreach and extension services to support landowner activities that enhance the conservation of bobolink and other grassland birds and species, while considering mutual benefits to farmers is also supported. Including specifically research that:

- 1. Determines the efficacy of best management options for bobolink and other grassland species of conservation concern in Ontario, especially within the context of ecosystem recovery and working landscapes
- 2. Evaluates costs and benefits of grasslands restoration for Ontario farmers and other rural landowners
- 3. Investigates the costs and benefits of using native grasses for biomass fuel in relation to the conservation of bobolink and other grassland species of conservation concern and
- 4. An analysis of habitat features where bobolink occurs in natural grasslands and old fields to assist in determining how restored tall grass and other native grassland communities could better support bobolink and other declining grassland bird species

Recognition of outstanding stewardship in general is a feature of Conservation Authority Watershed Stewardship initiatives and therefore provincial recognition of similar efforts addressing management of habitats for species like bobolink is welcome.

Finally, the establishment of an advisory group of stakeholders to provide advice on the above is greatly supported.

Thank you for the opportunity to provide comment on this amendment. Should you have any questions please contact myself at (905)895-0716 ext. 224, e-mail: <a href="mailto:jrzadki@conservationontario.ca">jrzadki@conservationontario.ca</a>.

Yours truly,

Jo-Anne Rzadki, MSc.

Watershed Stewardship Coordinator

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Cc: Don Pearson, Conservation Ontario Conservation Authority CAOs