

April 19, 2021

The Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
17th Floor, 777 Bay St.  
Toronto, ON  
M5G 2E5

Dear Minister Clark,

**Re: ERO # 019-3136 - Growing the Greenbelt**

Thank you for the welcome opportunity to provide input on expanding the Greenbelt. We, the 50 undersigned organizations, are pleased to provide the insights and recommendations below on how to grow and enhance the quality of Greenbelt and thereby better protect the vital benefits provided by farmland, water resources and natural areas within the Greater Golden Horseshoe (GGH).

Permanently protecting lands and waters within the Greenbelt is key to maintaining and improving the resiliency of local food systems and the physical, social and economic health of the nine million Ontarians living in the GGH. Healthy ecosystems are the foundation of human prosperity and will become increasingly important for building climate resilience.

The COVID-19 pandemic has made these facts clearer than ever before. Since the pandemic started, we all rely even more on Greenbelt-protected natural areas for our mental and physical health. We appreciate even more the Greenbelt-protected farmland and farmers who supply us with healthy local food and jobs. And we are profoundly grateful that Greenbelt-protected water resources provide a clean and secure water supply.

We note and support the government's stated intent to engage with Indigenous communities before any amendments are made, and trust that this will involve meaningful consultation that honours and is informed by the responsibilities, rights, interests and Traditional Knowledge of these communities.

We also appreciate the government's stated intent not to consider the removal of any lands from the Greenbelt during this expansion exercise. For years, developers and land speculators have been asking the provincial government to change the Greenbelt boundary to remove their land from Greenbelt protection. In some cases, they suggest that other lands elsewhere be reclassified as Greenbelt lands so that the total Greenbelt area is maintained. This would set an irreversible, dangerous precedent and make farmland less affordable. If it were to happen, the Greenbelt would cease to be a meaningful, permanent protection mechanism.

While we support, in principle, the plan to include the Paris Galt Moraine and additional Urban River Valleys in the Greenbelt, we believe the Ministry of Municipal Affairs and Housing (MMAH) must be more ambitious in its approach to Greenbelt expansion if it intends to protect precious farmland, groundwater and natural areas in the GGH from development and build the region's resilience to climate change.

Below we respond to the six consultation questions and offer our recommendations on how to proceed.

**Question 1: What are your thoughts on the initial focus area of the Study Area of the Paris Galt Moraine?**

While we support the inclusion of the Paris Galt Moraine we recommend that other moraines across the GGH be included as well. As MMAH notes in the ERO posting, the Paris Galt Moraine is the headwaters for many rivers and streams and "helps to protect and recharge the groundwater aquifers that provide the basis for a broad range of needs, including drinking water supply for many of the communities, sustaining local ecosystems, and growth and economic management." This is true of all moraines within the GGH. As further noted in the ERO posting, "moraines allow rain and snowmelt to soak into the ground more rapidly and in much greater amounts than the surrounding, less permeable areas. This process provides a reliable, slowly changing supply of water called baseflow to rivers and streams." These vital functions are especially important in enhancing resilience to the impacts of climate change such as extreme weather events, flooding and drought.

We therefore support the inclusion of the full Paris-Galt Moraine in the Greenbelt, including sections to the south and west of Brantford, and recommend that all other moraines in the GGH be included as well (e.g., the Orangeville Moraine, the Oro Moraine, the moraine between Waterloo and Elora/Fergus, the Waterloo Moraine, the Escarpment Area Moraines such as the Gibraltar and Singhampton Moraines, and the Horseshoe Moraines that flank the Niagara Escarpment to the north near Clearview).

**Question 2: What are the considerations in moving from a Study Area to a more defined boundary of the Paris Galt Moraine?**

We strongly recommend that MMAH use a science-based approach to defining the boundary so that it includes the area needed to: 1) protect all the headwaters and groundwater aquifers associated with the moraine; 2) ensure safe and abundant drinking water for dependent communities; 3) sustain local ecosystems; and 4) optimize resilience to climate change impacts such as flooding and drought.

The Province must meaningfully consult with Indigenous communities about expanding the Greenbelt within their traditional territories. The duty to consult is a constitutional

obligation that arises from s.35 of the Constitution Act, 1982, which recognizes and affirms Indigenous and Treaty rights. Indigenous traditional practices, responsibilities and knowledge systems must be honoured by ensuring Indigenous voices are key to any discussions involving expanding the Greenbelt.

**Question 3: What are your thoughts on the initial focus area of adding, expanding and further protecting Urban River Valleys?**

We support the inclusion of additional Urban River Valleys, but strongly recommend that private lands also be included in this designation. As noted in the ERO posting, publicly owned lands “are often lands designated in municipal official plans as parks, open space, recreation, conservation and/or environmental protection.” The designation of public lands under the Greenbelt will do little to enhance the quality of the Greenbelt, as the government intends. It is private lands within the Urban River Valleys, more so than public lands, that are threatened with urbanization and development.

We further recommend that MMAH designate entire river valley corridors rather than only sections flowing through urban areas in order to adequately protect the benefits provided by these important water bodies.

We recommend that all river valleys that connect the Greenbelt’s protected countryside to the Great Lakes and inland lakes be considered, including: the Nith, Grand, Conestogo, Eramosa, Speed, Nottawasaga, East Holland, Talbot, Ganaraska, and Don Rivers, and Duffins, Carruthers, Twelve Mile, Gages and Cobourg Creeks.

Urbanization has resulted in significant changes to many of these waterways. For instance, in the case of Carruthers Creek the aquatic ecosystem is already close to the level of land use and development it can sustain; natural cover is insufficient to maintain ecosystem resilience; water quality is impaired; and waterflow is out of balance, resulting in flooding and erosion issues.<sup>1</sup> Urbanization is driving land use change and impacting the health of the watershed “largely through the loss of natural cover and increase in impermeable surfaces.”<sup>2</sup> The drop in natural cover and farmland in a 16-year period (1999 – 2015) in that watershed is alarming: “In 1999, the watershed consisted of 28% natural cover, 53% agricultural lands, and 12% urban area. As of 2015, natural cover had dropped to 25% and agricultural lands to 34%. Urban land use increased to approximately 37% during that time period.”<sup>3</sup>

The loss of natural cover and farmland similarly threatens waterways across the GGH. To ensure their health and resilience, and to protect residents from flooding, entire river valley corridors and private lands must be included in the Urban River Valley designation.

---

<sup>1</sup> [https://trcaca.s3.ca-central-1.amazonaws.com/app/uploads/2020/09/22094211/Carruthers-Creek-Watershed-Plan-Digital-Version-Sept21\\_20.pdf](https://trcaca.s3.ca-central-1.amazonaws.com/app/uploads/2020/09/22094211/Carruthers-Creek-Watershed-Plan-Digital-Version-Sept21_20.pdf) , pp. 23- 26.

<sup>2</sup> Ibid., p. 30.

<sup>3</sup> Ibid., p.23.

#### Question 4: Do you have suggestions for other potential areas to grow the Greenbelt?

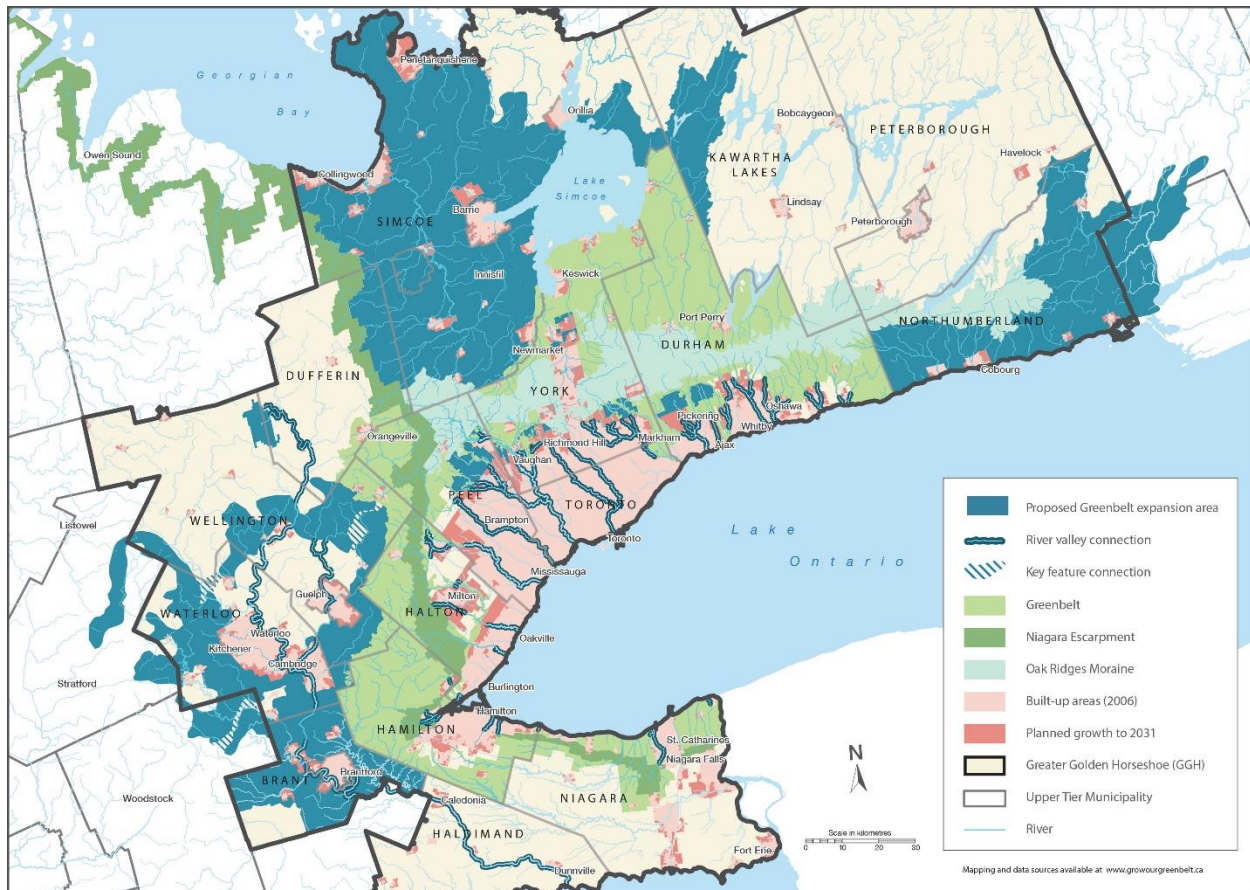
Expansion of the Greenbelt should focus on protecting areas of high ecological and hydrological value as well as agricultural areas that are under threat from urban development. More specifically, we recommend the following (based on the 2018 Bluebelt proposal of the Oak Ridges Moraine Partnership.<sup>4</sup> See map below.):

- i. Add all **moraines** in the GGH to the Greenbelt, as noted above. Moraines store, cool and clean water, providing groundwater recharge and discharge. Many communities in moraine areas are dependent on these moraines for all of their drinking water needs.
- ii. Include **coldwater streams** and **wetlands** when growing the Greenbelt. Coldwater streams improve water quality and provide important habitat for fish and wildlife (e.g., brook trout, endangered redbreasted dace). Wetlands across the GGH provide critical social and environmental benefits (water filtration, flood retention, erosion control, carbon storage, nutrient cycling, groundwater recharge, wild foods and medicines, wildlife habitat, recreational opportunities). Yet their loss has been significant (over 85 percent in Niagara and the GTA).
- iii. Include **headwater areas**, which play an extremely important role in the watershed, providing downstream benefits and functions such as improved water quality, storage and release and wildlife habitat. Changes in headwater areas through urbanization have negative impacts on downstream systems, both aquatic and terrestrial. The headwaters of south flowing stream systems within the inner ring of the GGH (the 'Whitebelt') are under high development pressures and should be a priority for inclusion (e.g., Humber, Don and Rouge Rivers and Duffins and Carruthers Creeks). The headwaters of the Grand River and other rivers being considered for Urban River Valley designation should also be included.
- iv. Include the former **Glacial Lake Algonquin and Iroquois Shorelines and Plain**. The shorelines of these former lakes are locally and regionally significant groundwater discharge zones, forming the headwaters of the coldwater streams in those areas. The Lake Iroquois Plain features significant coastal and inland wetlands as well as groundwater discharge areas that form the headwaters of dozens of creeks that flow into Lake Ontario, supporting fish species such as the endangered redbreasted dace. Environment Canada ranked the Iroquois Plain as the number one landscape south of the Shield in Ontario where conservation actions may have the greatest impact. It is home to 57 species at risk, has some of the largest and most extensive coastal wetlands in southern Ontario, and provides vital habitat for numerous bird species during migration. The Greenbelt already includes parts of the former Lake Algonquin shoreline (within York and Durham Regions) and Lake Iroquois shoreline (within Durham and Niagara Regions); given their hydrological significance it makes sense to add the remainder of these shorelines.

---

<sup>4</sup> <https://view.publitas.com/on-nature/protecting-water-eb-013-1661/page/1>

- v. Include the **Lake Simcoe basin and northern Simcoe County**. Many important hydrologic features in Simcoe County are vulnerable to land speculation and intensive development pressures.



### Question 5: How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities mentioned above?

The protection of natural and water resource systems and farmland must take priority. They are finite, irreplaceable and invaluable in terms of community and ecosystem health and resilience to climate change. Expanding the Greenbelt and protecting nature, water and farmland from development supports all provincial priorities given that they are the foundation of social and economic well-being.

Housing needs of communities in the GGH can be met within lands already designated for development. In all municipal regions except Toronto and Peel growth has been less than projected and there are existing large surpluses of land already available for development. The Neptis Foundation estimated in 2017 that the total supply of unbuilt land to accommodate housing and employment to 2031 and beyond across the GGH is 125,560 hectares.

Accordingly, we make the following recommendations:

- i. Instead of siting new developments on sensitive farmland and natural areas, the government should prioritize building complete communities (gentle density, people friendly, walkable, jobs close by, climate resilient) inside the boundaries of our existing towns and cities. Brownfields close to existing infrastructure should be the priority for siting commercial and industrial development.
- ii. Cancel plans to build Highway 413 (GTA West) and the Bradford Bypass (Holland Marsh Highway). These highways are expensive, not necessary and will permanently damage existing lands within the Greenbelt while also generating significant pressure by developers and municipalities to allow development along them. There are many other options available to manage the transportation needs of Ontarians that do not require sacrificing vital farmland, natural spaces and water resources.
- iii. Refrain from using Minister's Zoning Orders (MZOs) to fast-track development on natural areas and farmland. Conservation and agricultural organizations are united in their opposition to this misuse of MZOs which sidestep community consultation and local planning processes. At risk are the many benefits provided by Ontario's farmland and natural heritage features and areas, including flood control, local food, water purification, carbon sequestration, biodiversity conservation, recreational opportunities and more.
- iv. Allow municipalities to establish policies that go beyond the minimum standard set by the Greenbelt Plan. Policies that provide the highest level of protection for natural and hydrological features and farmland should prevail. We note with great concern, for example, that municipalities within the Greenbelt are not able to establish policies that are more restrictive on mineral aggregate extraction than those in the Greenbelt Plan even though, outside the Greenbelt, other GGH municipalities are able to establish policies that may be more restrictive on mineral aggregate extraction than the Growth Plan's policies. This is an odd and perturbing situation where municipalities are not allowed to go above and beyond Greenbelt policies to protect precious water resources. It creates a true conundrum for municipalities where more restrictive policies are deemed necessary to protect water quality and quantity: inclusion in the Greenbelt expansion would prohibit them from doing so. A case in point is Waterloo Region, a municipality with strong water resource protection policies that are more restrictive with respect to aggregates extraction than Greenbelt Plan policies. The region relies almost exclusively on groundwater for its drinking water supply, a critical consideration from a public health and safety perspective. It is unreasonable to expect Waterloo Region to sacrifice these higher local standards. Mineral aggregate extraction policies should default to the policy offering the highest level of protection for water resources, including municipal policies. Until this policy is revised, more restrictive municipal mineral aggregate extraction policies than those in the Greenbelt Plan should be grandfathered for municipalities that are part of the Greenbelt expansion, recognizing that the policies in the Provincial Policy Statement, the Growth Plan and the Greenbelt Plan generally represent minimum standards which decision-makers are encouraged to exceed to address matters of local importance.



## Question 6: Are there other priorities that should be considered?

We recommend that the following priorities be considered in expanding the Greenbelt:

- i. *Meaningful consultation with affected Indigenous peoples:* The government must proceed in a manner that honours and is informed by the responsibilities, rights, interests and Traditional Knowledge of Indigenous communities. Exploring options to expand the Greenbelt presents a potential opportunity to advance reconciliation among the peoples who share this land.
- ii. *Climate resilience:* Protecting natural and hydrological systems from development is a recognized “nature-based solution” to mitigating and adapting to climate change impacts. Ontario’s Special Advisor on Flooding noted in 2019 both the increasing frequency and intensity of extreme rainfall events and the importance of natural features such as wetlands in reducing associated flood damages and financial losses.<sup>5</sup> Among its sources, the report referenced two studies: one commissioned by the Ontario Ministry of Natural Resources and Forestry in 2017 which found that “maintaining wetlands can reduce flood damages and costs by 29% in rural areas and by 38% in urban areas;” and another by the Insurance Bureau of Canada documenting the “cost-effective” ability of wetlands to reduce flood damages and associated costs.<sup>6</sup> With regard to biodiversity more specifically, many plant and animal species will be at increasingly high risk of extinction as global temperatures rise.<sup>7</sup> Greenbelt expansion will help to safeguard natural corridors to facilitate species movement and adaptation in response to habitat loss and degradation, changing food webs and other climate-related stressors.
- iii. *Health and well-being:* Greenbelt expansion will provide many health benefits, including clean air and water and safe, local food. In addition, it presents an opportunity to maintain green spaces near our towns and cities, providing access to nature for current and future generations. The COVID pandemic has heightened public awareness of the significant health benefits of access to nature. These benefits include increased physical activity, better cognitive functioning, improved immune system functioning, greater resilience to stress, more positive social interactions and generally increased happiness. In fact, nine in ten Canadians feel happier when connected to nature.<sup>8</sup>
- iv. *Living within the carrying capacity of the land:* Greenbelt expansion will help to ensure that development decisions avoid unacceptable or irreparable damage to local ecosystems and the priceless benefits they provide.

---

<sup>5</sup>Ontario’s Special Advisor on Flooding Report to Government, *An Independent Review of the 2019 Flood Events in Ontario*. <https://files.ontario.ca/mnrf-english-ontario-special-advisor-on-flooding-report-2019-11-25.pdf>.

<sup>6</sup>Insurance Bureau of Canada et al., *Combatting Canada’s Rising Flood Costs: Natural infrastructure is an underutilized option*. <http://assets.ibc.ca/Documents/Resources/IBC-Natural-Infrastructure-Report-2018.pdf>.

<sup>7</sup>International Union for Conservation of Nature, December 2019, *Species and Climate Change*. [https://www.iucn.org/sites/dev/files/species\\_and\\_climate\\_change\\_issues\\_brief-2019-12.pdf](https://www.iucn.org/sites/dev/files/species_and_climate_change_issues_brief-2019-12.pdf).

<sup>8</sup>[https://view.publitas.com/on-nature/greenway\\_health\\_and\\_ecosystem\\_infographics/page/1](https://view.publitas.com/on-nature/greenway_health_and_ecosystem_infographics/page/1).

- v. *Advancing complementary provincial policies:* Greenbelt expansion presents opportunities to advance the achievement of objectives outlined in the Lake Simcoe Protection Plan, Ontario's Biodiversity Strategy, Ontario's Wetland Conservation Strategy and Ontario's Great Lakes Strategy. These objectives include enhancing water quality, retaining and restoring vegetative cover, protecting wetlands, conserving biodiversity, improving the status of species of conservation concern, and restoring watershed health and resilience.

Thank you again for the opportunity to participate in your initiative to expand the Greenbelt. We trust that our recommendations will be taken into account and would welcome an opportunity to discuss them with MMAH staff and advisors.

Yours truly,

*Caroline Schultz*  
Executive Director  
Ontario Nature



*Tim Gray*  
Executive Director  
Environmental Defence



*Yannick Beaudoin*  
Director General, Ontario and  
Northern Canada  
David Suzuki Foundation



*David Townshend*  
Executive Director  
Earthroots



*Paul Mero*  
Executive Director  
EcoSpark



*Geoff Kettel*  
President  
Federation of Urban  
Neighbourhoods (Ontario)



*Harold Smith*  
Past Director  
North American Native Plant  
Society



NORTH AMERICAN  
NATIVE PLANT SOCIETY

*Alison Howson*  
Executive Director  
Ontario Land Trust Alliance



*Sandy Riddolls*  
Chair  
Ontariogreen Conservation  
Association





*Katie Krellove*

Ontario Campaigner  
Wilderness Committee



*Deb Sherk*

President  
Bert Miller Nature Club



*Liz Benneian*

Executive Director  
Biodiversity and Climate  
Action Niagara



*Cheryl Lewandowski*

Chair  
Blue Dot York Region



*Norman Wingrove*

Acting President  
Blue Mountain Watershed  
Trust



*Tom Wilson*

President  
Carden Field Naturalists



*Michael Douglas*

Chair  
Concerned Citizens of Ramara



*Ron Reid*

Carden Program Coordinator  
The Couchiching  
Conservancy



*Lois Gillette*

President  
Durham Region Field  
Naturalists



*Wioletta Walancik*

Administrative & Programs  
Director  
Friends of Second Marsh



*Kevin Thomason*

Vice-Chair  
Grand River Environmental  
Network



*Lorraine Green and Carole Holmes*

Co-Chairs  
Grand(m)others Act to Save  
the Planet



***Yves Scholten***

*President*

Halton-North Peel Naturalists  
Club



***Chris Motherwell***

*President*

Hamilton Naturalists' Club



***Karen Yukich***

*Co-Chair*

High Park Nature



***Isabella Rombach***

*Co-Chair*

Huronian Land Conservancy



***Richard Tunstall***

*President*

Langford Conservancy



***Janet McKay***

*Executive Director*

LEAF® (Local Enhancement  
and Appreciation of Forests)



***Susan Hirst***

*President*

Midland-Penetanguishene  
Field Naturalists Club



***Judy Brisson***

*President*

Nature Guelph



***Joyce Sankey***

*Conservation Director*

Niagara Falls Nature Club



***Dorothy Wilson***

*Communications Officer*

Nith Valley EcoBoosters



***Cara Gregory***

*President*

North Durham Nature



***Bob Highcock***

*President*

Peninsula Field Naturalists



**Steve Paul**

*Board Director/Ontario  
Nature Representative  
Peterborough Field  
Naturalists*



**Steve LaForest**

*President  
Pickering Naturalists*



**Stephanie Sobek-Swant**

*Executive Director  
rare Charitable Research  
Reserve*



**Angus Inksetter**

*President  
Saugeen Nature*



**Debbie Gordon**

*Founder  
Save the Maskinonge*



**Margaret Prophet**

*Executive Director  
Simcoe County Greenbelt  
Coalition*



**Paul Harpley**

*President  
South Lake Simcoe Naturalists*



**Mark Cranford**

*President  
South Peel Naturalists' Club*



**Ian McLaurin**

*Interim Chair  
STORM Coalition*



***Ella Haley***

*Project Manager*

Sustainable Brant (Better  
Brant)

**Sustainable  
Brant**

***Otto Peter***

*President*

Thickson's Woods Land Trust



***Emmay Mah***

*Executive Director*

Toronto Environmental  
Alliance



***David M. Gascoigne***

*President*

Waterloo Region Nature



***Frank Godfrey***

*President*

Willow Beach Field  
Naturalists



***Rick Berry***

*President*

York Simcoe Nature Club



***Denis Paccagnella***

*President*

Orillia Naturalists' Club



***Susan Walmer***

*Chief Executive Officer*

Oak Ridges Moraine Land  
Trust

