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Conservation Ontario will be the leader in engaging Conservation Authorities in matters of common interest and in shaping effective policy related to Conservation Authorities

Conservation Ontario Council Report

From: Leslie Rich, Policy and Planning Liaison

Date: April 3, 2018

Subject: Conservation Ontario's comments on "Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring" (EBR #013-1661).

Summary

Further to the work undertaken through the Provincial Plan review, the province has released a consultation document on proposed building blocks to grow the Greenbelt in the outer ring of the Greater Golden Horseshoe. Conservation Ontario Council has previously endorsed the concept of growing the Greenbelt (December, 2016). Conservation Ontario's comments focused on utilizing the best available science and proactive approach to determine the extent of the proposed greenbelt expansion.

Recommendation

THAT the comments on "Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring" (EBR #013-1661) submitted to the Ministry of Municipal Affairs and Housing on March 7, 2018 be endorsed.

Background

On December 7, 2017, the Ministry of Municipal Affairs and Housing posted a Policy Proposal Notice titled "Protecting Water for Future Generation: Growing the Greenbelt in the Outer Ring". This Policy Proposal is further to the Co-ordinated Land Use Planning Review which resulted in updates to the Growth Plan for the Greater Golden Horseshoe Greenbelt Plan, Oak Ridges Moraine Conservation Plan, and Niagara Escarpment Plan released on May 18, 2017 and the Crombie Report which was released in 2015. Recommendation 71 of the Crombie Report tasked the province to "[e]stablish a Provincially led process, in consultation with the Niagara Escarpment Commission, municipalities, conservation authorities, stakeholders and the public, to grow the Greenbelt...beyond its current boundary using a

systems approach, based on areas of ecological and hydrological significance where urbanization should not occur”(p150).

L. Rich attended a Technical Meeting on the proposal on February 1st in Barrie. Staff from Lake Simcoe Region and Nottawasaga Valley Conservation Authorities were also in attendance. The Policy Proposal Notice and associated public consultation document were circulated to the CA Planning Contacts for comment. Comments were received from Credit Valley, Grand River, Halton, Lake Simcoe Region, Nottawasaga Valley and Toronto and Region Conservation Authorities. On March 7, 2018 Conservation Ontario submitted the attached response to the Province.

Current Status

Comments on the proposal were received from five Conservation Authorities. In addition, staff at Conservation Ontario collaborated with the Oak Ridges Moraine Partnership (consisting of EcoSpark, Ontario Nature, Save The Oak Ridges Moraine and Earthworks) in the finalization of the letter.

The March 7, 2018 attached response letter noted Conservation Ontario Council’s previous endorsement for the proposed provincially led process to identify additional areas of ecological and hydrologic significance to grow the Greenbelt. The letter recommends that the best available information should be utilized when identifying these areas, including municipal and CA data. It further recommends that the methodology used to determine the study area be released, so that experts at Conservation Authorities can compare the results vis a vis their own technical information. Overall, it was found that the province has taken a highly reactionary approach by concentrating the study area on areas which are under pressure from urban development, rather than taking an ecologically and hydrologically features based approach.

In growing the Greenbelt the response letter recommends that the Province also take into account climate change vulnerability and its commitments made in “A Wetland Conservation Strategy for Ontario – 2017-2030”.

Conclusion

The attached letter was submitted to the Ministry of Municipal Affairs and Housing on March 7, 2018. Conservation Ontario staff will continue to monitor the progress of the province in its efforts to grow the Greenbelt.



March 7, 2018

Protecting Water - Protéger l'eau Consultations
Ministry of Municipal Affairs and Housing
Local Government and Planning Policy Division
Provincial Planning Policy Branch
777 Bay Street, Floor 13
Toronto, ON M5G 2E5
Email: protectingwater@ontario.ca

Dear Sir/Madam:

Re: Conservation Ontario's Comments on "Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring" (EBR# 013-1661)

Thank you for the opportunity to provide comments on "Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring". These comments are provided by Conservation Ontario, which is the network of Ontario's 36 Conservation Authorities (CAs). Conservation Authorities provide support for the implementation of the provincial plans through their delegated responsibilities for natural hazard management, their role in watershed management, as plan review service providers to their municipalities and as one of the largest landowners in Ontario. Conservation Authorities were also instrumental in the development of Source Protection Plans including Assessment Reports as prepared under the *Clean Water Act*. These comments are not intended to limit consideration of comments shared individually by Conservation Authorities through the consultation process.

Through its endorsement of the letter dated October 3, 2016 on the Co-ordinated Land Use Planning Review Conservation Ontario Council provided its support for the proposed provincially led process to identify additional areas of ecological and hydrologic significance to grow the Greenbelt. The province is applauded for commencing this work.

This letter is structured to provide detailed comments on the document itself in addition to responses to the Ministry's discussion questions.

The Role of CAs and (Sub)watershed Planning

The province is commended for its efforts to work and consult directly with Conservation Authorities on this proposal. It is appropriate that CA expertise continue to be utilized through the development of the proposed boundaries and the current consultation. Other CAs outside of the potentially affected area have expressed support for the initiative – recognizing the obvious relationships and advantages of the "blue belt" approach. Conservation Halton noted that while their watershed is outside of the study area, they will continue to work with their member municipalities to consider options to include additional protections where appropriate (in the white belt) and to undertake watershed planning to identify a Water Resource system and its key hydrologic features and areas, as per the *Growth Plan*.

It is recommended that any potential changes to the Greenbelt area should ensure that watershed and subwatershed planning is promoted and implemented through municipal Official Plans. It is further recommended that this process should examine opportunities to develop provisions to measure the success of the proposed expansion. Conservation Ontario's Watershed Report Cards (<http://conservationontario.ca/policy-priorities/science-and-information-management/watershed-reporting/>) could provide a basis for such an analysis.

Purpose Statement

The consultation document states that the primary purpose for growing the Greenbelt in the outer ring is to "protect water for future generations". It is understood that the study area was determined based on the presence of water resources, communities that rely on groundwater for their water supply and growth pressures. The "Impacts of Urbanization on Water Resources" subsection in the introduction suggests reasons for improving protection of water resources, for example the need to recharge aquifers for drinking water and to support ecological processes; to prevent pollution, which impacts drinking water sources, fish habitat and aquatic ecosystems; and to manage stormwater runoff to reduce flooding, erosion, and other impacts to streams (e.g. water temperature). Conservation Ontario is strongly supportive of this direction, and suggests that the Province be more explicit in stating the objectives or principles for the current Greenbelt expansion in a standalone subsection – both to emphasize why Greenbelt expansion is necessary now and to facilitate evaluation of the effectiveness of the methodology (and future proposed boundary) in addressing provincial priorities. It is suggested that climate change considerations, as well as reference to the original Greenbelt principles, be included in these objectives or principles.

Methodology and Best Available Information

While it is recognized that this is a high-level consultation document, the methodology used to determine the study area is vague. A report on the methodology used to map the Natural Heritage System under the *Growth Plan* was provided during that particular consultation process (Development of the Proposed Regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe - technical report on criteria, rationale and methods, Ontario Ministry of Natural Resources and Forestry, 2017). A similar document should be provided for the mapping of the Greenbelt Study Area.

The best available information should be used to further refine the proposed expansion area. In some cases, local area information obtained by Conservation Authorities or municipalities may be more detailed and up-to-date than that used for the current Study Area mapping (ie. wetland mapping).

In keeping with the spirit of the *Growth Plan* and *Greenbelt Plan* to use watersheds as the scale for growth planning, the use of watersheds as a basis for the conceptual mapping is commended.

Limitations of Study Area

The consultation document notes that "[t]he study area currently proposed for potential Greenbelt expansion is guided by the protection of important water resources under pressure from urban development". Further, it notes that "[B]ased on initial analysis of historic and forecasted population change in the outer ring, the area of focus was narrowed to the western part of the outer ring where

population growth is the highest". While it is recognized that the current consultation map is conceptual, some of the proposed study area has already been designated for development. Waiting for an area to be "under pressure from urban development" is a highly reactive approach. It is recommended that the province use lessons learned through this consultation to identify additional important water features for potential inclusion in the Greenbelt in the outer right of the GGH, prior to the lands being designated for development.

Discussion Questions

1) Are there additional "building blocks" features that should also be considered for addition to the Greenbelt to protect water?

The methodology used to develop the limits of the Study Area and the various components of the maps that make up the Study Area should be provided for review. It is difficult to assess the approach used to create the mapping in the absence of this information. A map showing all of the "building blocks" overlapped would help to show the full picture in Appendix 1.

Consistent with recommendation #71 of the Crombie Report, key headwater areas (i.e., headwater drainage features) should be included as an additional building block to protect water. Headwater areas play extremely important roles in watersheds. Headwater streams make up the majority length of streams in a watershed (50% to 80%) and headwater catchments may account for as much as 90% of a river's flow. Headwater areas provide important downstream resources such as nutrients, organic material and sediment, as well as important downstream benefits and functions such as improved water quality, storage and release. Changes, therefore, in headwater areas through urbanization can have a negative impact on downstream systems, both aquatic and terrestrial.

Additional building block features for consideration should be fractured bedrock at or near surface (e.g. karst) as these areas would provide significant recharge opportunities. Another consideration would be the shallow groundwater flow system which would contribute base flow to the surface water systems.

2) Are there additional data sets or types of analysis that should be considered?

It was previously noted that the best available information should be used to further refine the proposed expansion area. For example, the Grand River Conservation Authority has identified many wetlands that are not included in the provincial mapping – a difference of approximately 5, 251 hectares. Baseline characterization of groundwater levels, source water function and meteorological datasets is critical to determine the existing 'performance' of the systems and how it responds to various pressures (change in % imperviousness, climatic overprints, change in land use, etc). This integrated approach demonstrates the strong need for cohesive data management.

It is strongly recommended that the province undertake an examination of Drinking Water Source Protection (produced and funded under the provincial Clean Water Act, 2006) delineation of significant groundwater recharge area, highly vulnerable aquifers, significant surface water contribution areas, and wellhead protection areas. Further mapping of ecologically significant groundwater recharge areas would be beneficial to characterize the hydrologic linkage of groundwater-surface water interactions (recharge-discharge relationships).

CA and other available temperature data should be incorporated to confirm coldwater stream reaches. A methodology to refine mapping based on new information should also be developed, in order to include or remove areas from the Greenbelt.

Additional data sets for analysis to be considered include:

- Provincial Groundwater Monitoring Network and Provincial Water Quality Monitoring Network base flow dataset (groundwater levels and quality information);
- The Ontario Geological Survey south and central Simcoe models (in development);
- The oakridgeswater.ca hydrologic data platform;
- Provincial, municipal, or Conservation Authority Natural Heritage System or key natural heritage/hydrological features mapping;
- Ecologically significant groundwater recharge areas identified by some CAs;
- Directions and requirements coming from the Ministry of Environment and Climate Change's forthcoming Low Impact Development Stormwater Management Guidance Manual; and
- Outcomes associated with any (sub)watershed planning process within the study area.

Overall, it would be beneficial to review the information used to determine the Study Area vis a vis other technical information available to ensure that the most current data set for the watershed is utilized.

3) Of the seven areas, are there some that are more or less important?

All seven of are equally hydrologically important given the hydrologic features as defined in the *Growth Plan, Lake Simcoe Protection Plan, and Oak Ridges Moraine Conservation Plan* support both locally and regionally significant groundwater features.

4) Are there areas beyond the study area that you think should be considered for potential future Greenbelt expansion?

As noted above, Conservation Ontario supports a *proactive* identification of features and functions, prior to growth pressure becoming excessive. It is recommended that a science-based approach be utilized to inform future "blue-belting" across the outer ring, as appropriate.

5) Should the province consider adding rivers that flow through urban areas as Urban River Valleys in the Greenbelt?

In 2013, Conservation Ontario Council endorsed the concept of adding rivers that flow through urban areas as Urban River Valleys (URV) in the Greenbelt. While it is recognized that the protection of Greenbelt URV would mostly rely on appropriate designation within municipal Official Plans, growing the Greenbelt through these valleys and other contiguous regional and local-scale system connections makes sense.

In the consultation document, it would be helpful to provide a description of the URV designation similar to the descriptions provided for the systems within the Protected Countryside. This description should include information related to the policy implications.

6) With the range of settlement areas in the GGH, how should the province balance accommodating future urban growth with protecting water resources?

It is understood that the study area was determined by identifying areas where forecasted growth, surface water features, and groundwater features overlap. In evaluating the methodology used to form the study area and moving to a proposed Greenbelt boundary, it is suggested that a refined approach to understanding the interaction between growth pressures, hydrologic functions and hydrological capacity is utilized to enable a more evidence/science-based assessment of the vulnerability of these water resources. This would, in turn, inform which of the seven geographic areas and if any areas beyond the study area are in the greatest need of Greenbelt protection.

Moving forward, an analysis should be completed with data regarding hydrological capacity to support growth in settlement areas. As noted in our October, 2016 comments on the Co-ordinated Land Use Planning Review, Conservation Ontario supports the integration of provincial initiatives within the provincial plans. Therefore, the analysis of the hydrological capacity should consider results from the Tier 3 Water Budget Assessments completed as part of the applicable Source Protection Plans under the *Clean Water Act, 2006* which identify existing and anticipated amounts of water use within the watershed and areas vulnerable to water quantity threats. The ability of municipal drinking water supplies to meet current and future needs should be a key part of the analysis in determining which features and areas require permanent Greenbelt protection. Overlaying this data over existing features could provide justification for protecting certain features and areas. Consideration should also be given to *Clean Water Act, 2006* source protection plans, which contain policies that could require hydrological and hydrogeological assessments for certain future development and buildings.

While it is recognized why the province sought to find areas of feature overlap for potential inclusion in the Greenbelt, the analysis should not ignore, by default, areas containing little or no overlap among the three “building blocks” features. For example, areas with limited groundwater resources available to sustain forecasted population growth (as determined through a Tier 3 Water Budget or other analysis) should warrant consideration for addition to the Greenbelt, even if no overlap between features is identified. In addition, important recharge zones may be identified well upslope of sensitive ecological areas. Through their own technical analyses, CAs have identified important recharge and discharge zones in disparate locations (i.e. no overlap).

7) What are other key considerations for drawing a potential Greenbelt boundary around settlement areas?

Conservation Ontario supports the province’s watershed-based approach to determining the study area. In terms of plan implementation, it is recommended that so long as the entire extent of features and their buffers is captured, the proposed (and final) Greenbelt boundary should be aligned with (i.e. extended to) existing boundaries such as roads, lot lines, and/or municipal boundaries as appropriate. This approach to delineating the boundary would encompass the limit of features and buffers, and possibly additional areas that are complementary to these features, while simplifying plan implementation. This would also avoid split designations on lots where part of a lot is within the Greenbelt and part of it is located outside.

Conservation Ontario supports the Lake Simcoe Region Conservation Authority and the Oak Ridges Moraine Partnership’s assertions that the assimilative capacity of water bodies should be a factor to consider when determining the breadth of Greenbelt expansion. Significant investment in consolidating

small or updating existing sewage treatment will be required in order to maintain the assimilative capacity of the watercourses in the outer ring as development pressures increase.

8) How should the province determine which settlement areas become Towns/Villages or Hamlets, if included in a potential Greenbelt?

Conservation Ontario has no position on this question.

9) Once the Agricultural System and Natural Heritage System under the Growth Plan are finalized, how should they be considered as part of potential Greenbelt Expansion?

The Agricultural System and Natural Heritage System under the *Growth Plan* have now been released. They should be considered as part of the potential Greenbelt expansion however the best available science should be the ultimate determinant as to the extent of the Greenbelt expansion. Identification of these systems tie into the “building blocks” approach with the requirement to map wetlands, streams and other features important to maintaining water resources.

In addition, CA staff require clarification as to whether or not the Agricultural System and Natural Heritage System policies of the *Greenbelt Plan* would apply with an expansion. Information on how to reconcile the *Growth Plan* systems with the proposed Greenbelt expansion will be necessary.

10) How should other provincial priorities or initiatives, such as mineral aggregates and infrastructure, be reflected in potential Greenbelt expansion?

As noted previously, existing and future water abstraction for municipal use should be considered as part of the potential Greenbelt expansion. There should a conflict resolution process to address conflicts between provincial plans - e.g. the *Growth Plan* systems and the proposed Greenbelt expansion.

11) What other priorities or initiatives do you think the province should consider?

It is understood that as part of the province’s work on climate change, the Ministry of Environment and Climate Change is proposing to undertake a province-wide climate change vulnerability assessment that would include ecosystem vulnerabilities. Climate change vulnerability assessment data that determine the baseline vulnerability of natural systems, including groundwater, aquatic and terrestrial functions, should be used to inform areas where actions to minimize vulnerability, such as through addition to the Greenbelt, should be prioritized.

Finally, the province should consider the commitments made in “A Wetland Conservation Strategy for Ontario – 2017-2030”. As wetlands are considered one of the “building blocks” within this proposal, it makes sense that the growth of the Greenbelt may contribute to achieving the target of stopping the net loss of wetland area and functions where wetland loss has been the greatest.

Thank you for the opportunity to provide comments on “Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring”. CAs continue to support the concept of further protecting important water resources, and their functions, outside the current Greenbelt Plan within the GGH (the ‘outer ring’). Please contact me at extension 226 should anything in this letter require clarification.

Sincerely,

A handwritten signature in black ink that reads "Leslie Rich". The signature is written in a cursive, flowing style.

Leslie Rich, MES RPP
Policy and Planning Liaison
c.c. All CA CAOs/GMs

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