



April 14, 2021

Ministry of Municipal Affairs and Housing  
C/O: [greenbeltconsultation@ontario.ca](mailto:greenbeltconsultation@ontario.ca)

**RE: Conservation Ontario's Comments on the "Consultation on growing the size of the Greenbelt" (ERO#019-3136)**

To Whom It May Concern:

Thank you for the opportunity to provide comments on the "Consultation on growing the size of the Greenbelt". Conservation Ontario is the network of Ontario's 36 conservation authorities (CAs). Conservation Ontario and CAs appreciated the opportunity to participate in the two information sessions hosted by the Ministry of Municipal Affairs and Housing in March, 2021 which focused on the Paris Galt Moraine study area, as well as the Urban River Valley areas. These comments are not intended to limit consideration of comments shared individually by CAs through this review and consultation process.

Conservation authorities are local watershed management agencies that deliver programs and services which protect and manage water and other natural resources in partnership with government, landowners and other organizations. In their role as watershed management agencies, CAs provide support for the implementation of the Greenbelt Plan, and help municipalities and the Province reach the objectives of the Plan in a number of ways, including through their delegated responsibilities around flooding and other natural hazards; as service providers to their municipal partners; and as one of the largest landowners in Ontario. The Greenbelt Plan provides municipalities, CAs, and other stakeholders with strong policies, especially as it relates to the delineation and protection of natural heritage systems, key natural heritage features and hydrologically sensitive features. CAs are highly supportive of the Greenbelt Plan's continued protection of the agricultural land base as well as ecological and hydrological features, areas and functions which help to support healthy, resilient communities.

Through the current consultation (ERO#019-3136), it is understood that the Province is seeking feedback on ways to grow the size and further enhance the quality of the Greenbelt, with an initial priority focus on a study area of the Paris Galt Moraine, as well as identifying opportunities for adding, expanding and further protecting Urban River Valleys (URVs) to further connect the Greenbelt's protected countryside lands to the Great Lakes and inland lakes. The URV designation would only apply to publicly owned lands. As part of this consultation, the Province has prepared six discussion questions to facilitate public and agency feedback. Conservation Ontario offers the following responses to the questions included in the Environmental Registry posting.

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

Conservation authorities are supportive in principle of the initial focus on the Study Area of the Paris Galt Moraine for inclusion in the Greenbelt protected area. The protection of the Moraine represents an important step to further protect Ontario's freshwater systems (e.g., headwaters, source water protection areas, etc.). The Moraine provides a number of ecological and hydrological benefits, including functioning as a regional groundwater recharge zone to support a continued supply of drinking water, as well as acting as a groundwater storage and discharge area which supports high-quality coldwater headwater stream habitat. As the Moraine falls within the watershed jurisdiction of the Grand River Conservation Authority (GRCA), the Province should endeavour to consult directly with the GRCA, as well as affected local municipalities to ensure there is local support for the inclusion of this study area.

Regarding the proposed study area as presented in the "Paris Galt Moraine Study Area Map (high resolution)", it is noted that the Province has not provided the data and methodology used to develop the limits of the study area, therefore making it challenging to provide effective comments on the proposed limits. While the consultation study area map indicates that the Moraine map was derived from various provincial sources (Ministries of: Municipal Affairs and Housing; Environment, Conservation and Parks; and, Energy Northern Development and Mines), it is recommended that the Province consult directly with the affected municipalities and the conservation authority to ensure that the most current data regarding the moraine are utilized. Available mapping includes detailed drinking water source water protection mapping, subwatershed studies, as well as mapping related to watercourses and wetlands within the GRCA watershed. Through information shared at recent stakeholder information sessions, it is understood that the Province will be undertaking further consultation once a more defined study area is developed. This updated study area should be completed in conjunction with the GRCA. Conservation Ontario looks forward to reviewing these maps once prepared.

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

As the Province moves towards a more defined boundary of the Paris Galt Moraine, it will be necessary to ensure that the entire feature is included within the proposed boundary, as supported by appropriate scientific/technical studies to ensure the protection of key hydrological and geological features and characteristics. Consideration should also be given to providing an appropriate setback around the feature in consultation with the affected municipalities and conservation authority. Once complete, the Province should work with affected municipalities, local conservation authorities (e.g., the GRCA) and other stakeholders in the watershed to prepare mapping that is acceptable to the Province for inclusion in municipal Official Plans (e.g., identifying the Paris Galt Moraine as a key hydrologic area as defined by the Growth Plan and Greenbelt Plan). When developing the more refined boundary, the Province is encouraged to provide the data/information used to develop the study area to municipalities to identify all components of water resource systems, including key hydrologic features and areas, such as the Paris Galt Moraine.

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

Conservation authorities are supportive in principle of the Province's intent to add, expand and further protect Urban River Valleys. The Province's continued efforts to expand the protection offered to natural heritage systems in Southern Ontario and improving connectivity of these systems throughout the Greenbelt is welcomed, however, CAs provided a number of comments / concerns outlined below.

Primarily, it is noted that the Urban River Valley designation under the Greenbelt Plan only applies to publicly owned lands in urban river valleys. As such, any additions, expansions or further protections would need to be proposed and supported by municipalities, with the Province providing opportunities for robust consultation with the public.

Additionally, it is important to note that URVs are also subject to many protective policies and regulations currently in place. These include policy statements and provincial plans (e.g., the Provincial Policy Statement and A Place to Grow: Growth Plan for the Greater Golden Horseshoe), Drinking Water Source Protection Plans, municipal and conservation authority policies and associated regulations. For example, municipal Official Plan policies identify protections for natural hazard and heritage features and/or systems, with local plans including provisions for parks, heritage, tourism and recreational land uses. In addition, conservation authorities' individual regulations (Development, Interference with Wetlands and Alterations to Shorelines and Watercourses) enables conservation authority review of future proposals in natural hazard areas, with consideration to how development could potentially impact people and property. As such, although CAs are supportive of adding, expanding and further protecting URVs in principle, given the suite of existing protections afforded to these features, the inclusion of portions of urban river valleys under the URV designation does not appear to be necessary to achieve the desired outcomes of the Greenbelt Plan.

A significant limitation of the Urban River Valley designation is that the Greenbelt policies associated with the designation apply only to 'publicly' owned lands. While it is recognized that one of the "Principles of Growing the Greenbelt Expansions" includes "no consideration of policy changes" the principle is described as **not** reducing the existing protections in the Greenbelt. As an alternative, the Province could consider **amending the policy to remove the restriction of the URV designation to 'publicly' owned lands**. This could potentially expand the protection of the connection of the Greenbelt to the Great Lakes and inland lakes.

Through this review, conservation authorities have identified a number of URVs which may benefit from the URV designation under the Greenbelt Plan. The following areas are offered for initial consideration for additions, expansion or further protections to URVs. It is important that when considering these lands, direction and support be provided from all affected municipalities prior to finalizing expansions to the existing Greenbelt boundaries:

1. **Fourteen Mile Creek (Town of Oakville)** – Currently designated as an URV in North Oakville, however, the designation terminates at the North Service Road and does not connect to Lake Ontario. Consideration should be given to studying the remaining portion of Fourteen Mile Creek Valley, extending south to Lake Ontario for inclusion in the URV designation under the Greenbelt Plan.
2. **Montgomery Creek (City of Oshawa)** – Proposed addition of the coastal wetland areas at the mouth of Montgomery Creek and the valleyland system north to Bloor Street in the City of Oshawa.

3. **Bowmanville / Westside Marshes Conservation Area (Municipality of Clarington)** – Proposed addition of Central Lake Ontario Conservation Authority owned lands forming the Westside Marsh within Bowmanville / Westside Marshes Conservation Area, extending to the area currently designated at the Bowmanville Marsh in the Municipality of Clarington.
4. **Second Marsh / McLaughlin Bay (City of Oshawa / Municipality of Clarington)** – Proposed addition of a connection between Second Marsh and McLaughlin Bay to the east to incorporate Darlington Provincial Park in the City of Oshawa and Municipality of Clarington.
5. **Credit River (Halton Hills)** – The Credit River is currently designated as a URV through Brampton and Mississauga. The eastern side of the river between Norval and Glen Williams in Halton Hills is designated as Greenbelt Natural Heritage System, however, the west side of the river valley has no Greenbelt designation. The Province should explore the opportunity to include this portion of the river under the URV designation.
6. **Stoney Creek and Battlefield Creek (City of Hamilton / Stoney Creek)** – Both Stoney Creek and Battlefield Creek are urban river valleys that connect Lake Ontario to existing Greenbelt designated lands above the Niagara Escarpment. The Province may consider including these existing urban river valleys in the designation under the Greenbelt Plan to enhance protection for the features.

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

Overall, CAs are supportive of exploring other potential areas to grow the Greenbelt. As with Conservation Ontario’s comments in response to the previous question, any proposal to grow the Greenbelt should include ample opportunity for public consultation and engagement. Future proposed expansions should also be based on the scientific mapping of the province, municipalities and conservation authorities.

Through this review, CAs have identified the following suggestions for other potential areas to grow the Greenbelt:

1. **Ratray Marsh (City of Mississauga)** – Ratray Marsh is a Provincially Significant Coastal Wetland with unique and diverse characteristics which provide ecological, hydrogeological and recreational value to the local and regional community. The Marsh connects to the Credit River via the Lake Ontario shoreline and local natural heritage systems. The Province is encouraged to consider the inclusion of Ratray Marsh in the Greenbelt Natural Heritage System designation.
2. **Twenty Mile Creek and Welland River (Niagara Region)** – The headwaters of both the Twenty Mile Creek and the Welland River are currently included as part of the Greenbelt Natural Heritage System, with the lower reach of the Twenty Mile Creek also included under the NHS designation. The Province should consider extending the designation to the full reach of both features.
3. **Minesing Wetland Complex, Oro Moraine (Conceptual Corridor)** – The Minesing Wetland Complex is designated as a wetland of international significance, spanning an area of more than 6,000 hectares and home to a diverse array of habitats. Currently, areas in West Mulmur Township are protected through the existing Greenbelt and Niagara Escarpment Plan areas. The Province is encouraged to consider extending the Greenbelt protections from the currently protected areas eastward, connecting the Minesing Wetland Complex, as well as the existing natural corridor which adjoins to the Oro Moraine. The Oro Moraine serves several important ecological functions, including acting as a groundwater recharge for its immediate area. Much of this “conceptual corridor” is currently protected under various designations (provincially significant wetlands, areas of natural and scientific interest, provincial parks and the provincial

Natural Heritage System), however, extending the Greenbelt protection would connect and ensure continued protection for these features.

4. **Lake Ontario Waterfront (East-West Regional Wildlife Habitat Movement Corridor)** – Portions of the Lake Ontario waterfront between Lynde Shores Conservation Area and Newcastle Village are protected by conservation areas, Greenbelt boundary and existing URV designations at the mouth of certain creeks. However, there are several core wildlife habitats along the shoreline that would benefit from additional protections through the URV designation under the Greenbelt Plan. The Province is encouraged to consider enhancing wildlife habitat protections and movement corridors, along with improving connectivity within the existing Greenbelt Plan area through an URV designation across the entirety of the Lake Ontario waterfront, connecting and linking the Lynde Shore conservation area, the existing coastal wetland areas containing URV designations, and Greenbelt Lands east of Newcastle village.
5. **Former Lake Iroquois Beach (East-West Regional Wildlife Habitat Movement Corridor)** – The Former Lake Iroquois Beach is partially protected by the Heber Down and Stephen's Gulch Conservation Areas, and the Greenbelt in portions of Whitby and Clarington, however, there are gaps in eastern Whitby, Oshawa and north Courtice and Bowmanville. This area represents a significant corridor for wildlife habitat and movement. The Province is encouraged to consider addressing these gaps through an URV addition to the Greenbelt Plan.
6. **Northumberland County** – Greenbelt expansion outside of the limits of the Oak Ridges Moraine has been considered within Northumberland County. Should the Greenbelt expand into the County, urban watercourses including the Ganaraska River in Port Hope and Cobourg Creek in Cobourg should be included in the URV designation.

**Question 5: How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities (referenced in the ERO posting)?**

Conservation Ontario acknowledges that any potential expansions of the Greenbelt Plan need to be carefully coordinated with other provincial priorities, including growth management and supporting infrastructure. As part of achieving this balance, robust municipal and provincial Natural Heritage System planning should occur to properly balance lands for protection and inclusion within the Greenbelt, while allowing growth to occur to achieve municipal and provincial targets. Opportunities to add new municipal Natural Heritage System lands to the Greenbelt (as identified through Municipal Comprehensive Reviews) should continue to be explored to ensure that appropriate lands are identified and set aside for protection under the Greenbelt Plan (as applicable).

Currently, municipalities are working towards updating their official plans by 2022 to conform with the revised growth forecasts in Schedule 3 of *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* ("GGH Growth Plan"). The Province's review of these updated plans will provide an opportunity to complete an analysis of any gaps in the protection of Natural Heritage and Water Resource Systems. Any policy gaps which are identified through this process should be prioritized and addressed by the Province through future amendments to the GGH Growth Plan or an expansion to the Greenbelt Plan.

Finally, given that many municipalities in the proposed study area have robust policies in place to protect municipal groundwater drinking resources, consideration should be given to amending the Greenbelt Plan to require decisions to conform to or exceed the protections of the Greenbelt Plan for groundwater resources.

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

Conservation Ontario offers the following additional priorities for consideration as the Province considers options for growing the Greenbelt:

1. **Climate Change** – The priority of climate change is one that should be considered when evaluating future expansions/additions to the Greenbelt. Growing the Greenbelt will assist the Province with achieving some of its objectives related to climate change, including increasing resiliency on the landscape.
2. **Social / Societal Needs** – Similar to the policies of the Provincial Policy Statement, 2020 regarding “healthy, liveable and safe communities” (section 1.1.1), expansions and/or additions to the Greenbelt should consider community needs from a well-being perspective. As much as appropriate housing and infrastructure is required, the pandemic has demonstrated that communities need to be designed so that they contain a mixture of built and natural areas, with due consideration to the public health and recreational needs of community members.
3. **Protection beyond URVs** – In considering expansions to the Greenbelt Area, the Province is encouraged to consider “East-West” water resource and/or ecological connections, similar to those mentioned in response to the previous questions (e.g., East-West Regional Wildlife Habitat Movement Corridors). Such “East-West” corridors, in concert with other protected areas, would enhance a “systems-based” approach within the Greenbelt, and could be used to improve connectivity for the movement of plants and animals across the landscape and recognize the regional significance of ecological and hydrological linkages outside of the Urban River Valley areas.

Thank you for the opportunity to provide comments on the consultation on growing the Greenbelt. Should you have any questions about this letter, please contact myself directly at extension 226.

Sincerely,



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c.c. All CA CAOs/GMs