



April 19, 2022

Ministry of Municipal Affairs and Housing

Submitted via email: greenbeltconsultation@ontario.ca

Re: Conservation Ontario's Comments on the "Proposed Amendment to the Greenbelt Plan – Growing the size of the Greenbelt" (ERO #019-4485); "Proposed Amendment to the Greenbelt Area boundary regulation – Growing the size of the Greenbelt" (ERO #019-4483); "Ideas for adding more Urban River Valleys" (ERO #019-4803)

To Whom It May Concern:

Thank you for the opportunity to provide comments on the consultations for "Growing the size of the Greenbelt". Conservation Ontario is the network of Ontario's 36 conservation authorities (CAs). These comments build upon the comments submitted as part of the "Consultation on growing the size of the Greenbelt" (ERO#019-3136) submitted to the province on April 14, 2021 by Conservation Ontario. These comments are not intended to limit consideration of comments shared individually by CAs through this review and consultation process.

Proposed Amendment to the Greenbelt Plan and the Area boundary regulation

Conservation authorities are supportive of the Province's intent to add, expand and further protect Urban River Valleys (URVs), including those that were identified by Conservation Ontario in their April, 2021 letter. 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.

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. It is understood that the government is not considering policy changes that would reduce existing protections in the Greenbelt. It is therefore recommended that the province 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.

Ideas for adding more Urban River Valleys

Overall, CAs are supportive of exploring other potential areas to grow the Greenbelt. Any proposal to grow the Greenbelt should include ample opportunity for conservation authority, municipal and public consultation and engagement. Future proposed expansions should also be based on the scientific mapping of the province, municipalities and conservation authorities.

CAs have previously 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, shoreline resiliency could be improved through additional protections through the URV designation under the Greenbelt Plan. The Province is encouraged to consider 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**– 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. 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 have 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.

In addition, the Ministry has identified that more time is needed to understand how the proposed addition of the Paris Galt Moraine may impact other provincial priorities. It is recommended that any additional consultation involving the expansion of the Greenbelt in that area should include the affected municipalities as well as the Grand River Conservation Authority.

Thank you for the opportunity to provide comments on the consultations for “Growing the size of the Greenbelt”. Should you have any questions please contact me at extension 226.

Sincerely,



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c.c. all CA CAOs/GMs