

April 22, 2022

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

Dear Minister Clark,

RE: Proposed Amendment to the Greenbelt Plan, ERO #019-4485; proposed amendment to the Greenbelt Area boundary regulation O. Reg. 59/05, ERO #019-4483; and ideas for adding or expanding Urban River Valleys, ERO # 019-4803.

We, the 62 undersigned organizations, would like to convey our profound disappointment with the narrow, minimalist and inadequate scope of the government's proposed expansion to the Greenbelt, as set out in the Ministry of Municipal Affairs and Housing (MMAH) phase 2 consultation. We, and over 6,000 members of the public, participated in good faith in the 2021 consultation.¹ Yet, this input was almost entirely ignored.

The ministry's summary of the public response has little consistency with the vast majority of the submissions you received concerning Greenbelt expansion. This input focused on the need to include farmland and natural areas that are vulnerable to land speculation and intense development pressures. Although there was support for protecting urban river valleys (URVs), almost no one listed this as a primary concern. Almost all feedback supported inclusion of the Paris-Galt Moraine, which MMAH no longer proposes to add to the Greenbelt.

The importance of permanently protecting lands and waters within the Greenbelt cannot be overstated. It is key to maintaining and improving the resilience of local food systems and the physical, social and economic health of the nine million Ontarians living in the GGH. The Greenbelt also supports some of the last refuges in Canada for some rare and at-risk animals and plants, refuges that will be globally and nationally recognized as Key Biodiversity Areas.² Healthy ecosystems are the foundation of human prosperity and will become increasingly important for building climate resilience.

¹ According to MMAH's summary, there were over 6,150 comments, including 950 unique submissions, and over 5,200 submissions from write-in campaigns.

² Key Biodiversity Areas are identified through a quantitative and objective ecological assessment following nationally and internationally recognized methods. For more info, visit www.kbacanada.org.

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 deeply grateful that Greenbelt-protected wetlands, rivers, moraines and headwater areas provide a clean and secure water supply.

Unfortunately, the government's phase 2 proposal for the Greenbelt offers no new protection for the lands and waters that are so vital to our well-being, despite the accelerating crises of biodiversity loss and climate change that we face.

Addition of URVs to the Greenbelt: an inadequate gesture

The phase 2 proposal for Greenbelt expansion includes only the addition and expansion of publicly owned lands within URVs. MMAH is proposing to add two new URVs (Stoney Creek and Battlefield Creek in Hamilton) and to expand 11 existing URVs (Wilmot Creek, Soper Creek and Bowmanville Creek in Clarington; Harmony Creek through the addition of Darlington Provincial Park, partially located in Oshawa and in Clarington; Oshawa Creek in Oshawa; Fourteen Mile Creek in Oakville; Don River in Toronto through the addition of Burke Brooke, Wilket Creek and Taylor-Massey Creek; and Humber River in Toronto through the addition of Humber Creek and Black Creek). According to your ministry's estimates, these additions total 940 hectares (2,325 acres). To put this number in perspective, urban development is gobbling up about 175 acres of farmland per day³ – about the same amount lost forever in just two weeks as would be added to the Greenbelt through the phase 2 proposal.

Furthermore, these additions would affect only publicly owned lands. As noted in the ERO posting: "URV lands are mostly designated in municipal official plans as parks, open space, recreation, conservation and/or environmental protection." In other words, these are lands that are not under threat of development. Rather, it is private lands within the urban river valleys that are threatened with urbanization and development and yet these are explicitly excluded from the phase 2 proposal.

Nevertheless, although the inclusion of these public lands in the Greenbelt would do little to enhance their protection, there are some benefits. Greenbelt designation would enhance public awareness of their importance as ecological corridors and of the Greenbelt generally. The greater the public awareness of their value, the more likely they are to be properly managed and protected by governing authorities. For this reason, we do support their designation. We recommend that MMAH go much further, however, and add all river valleys that connect the Greenbelt's protected countryside to the Great Lakes and inland lakes as URVs, including: the Nith, Grand, Conestogo,

³ <https://homegrown.ofa.on.ca/>

Eramosa, Speed, Nottawasaga, East Holland, Talbot and Ganaraska 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. 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.” 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.”⁴

The loss of natural cover and farmland similarly threatens waterways across the GGH. Ultimately, a new approach is needed to URV designation to ensure their health and resilience, and to protect residents from flooding. We 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 also recommend that Greenbelt policy be amended to include private lands in the URV designation.

Paris Galt Moraine: protection denied

Even though the original Greenbelt expansion proposal in February 2021 (ERO# 019-3136) included the addition of the Paris Galt Moraine, MMAH has decided not to proceed. The decision notice posted on March 24, 2022 cited concerns from municipalities, landowners and stakeholders as its reason for backing away from this significant expansion proposal.⁵ However, a review of the actual comments/submissions provided during the public consultation shows almost no opposition to the inclusion of the Paris Galt Moraine.

MMAH’s decision to exclude the moraine from the proposed Greenbelt expansion is even more confounding given all-party support for Bill 71, the proposed *Paris-Galt Moraine Act, 2019*. Based on the *Oak Ridges Moraine Conservation Act, 2001* the bill passed second reading unanimously in the Ontario Legislature in 2019, signaling unchallenged support for protecting the moraine through effective land-use policies.

We recommend that MMAH reverse its decision and proceed as originally planned with adding the Paris Galt Moraine to the Greenbelt. As MMAH noted in its 2021 ERO

⁴ 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.

⁵ <https://ero.ontario.ca/notice/019-3136>

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.”

Commitment not to remove lands from Greenbelt: misleading

MMAH states that no land removal or land exchanges are part of the phase 2 proposal. While true in terms of this narrowly scoped proposal, which focuses exclusively on URVs, the fact remains that the government is pushing forward with plans to build Highway 413, the Bradford Bypass and the Highway 404 extension through the Greenbelt. These highways will destroy hundreds of hectares of Greenbelt protected countryside and adversely impact farmland, wetlands, rivers and forests all along their corridors.

We recommend that MMAH uphold the government’s repeated promise to protect the Greenbelt by cancelling plans to build Highway 413 and the Bradford Bypass.

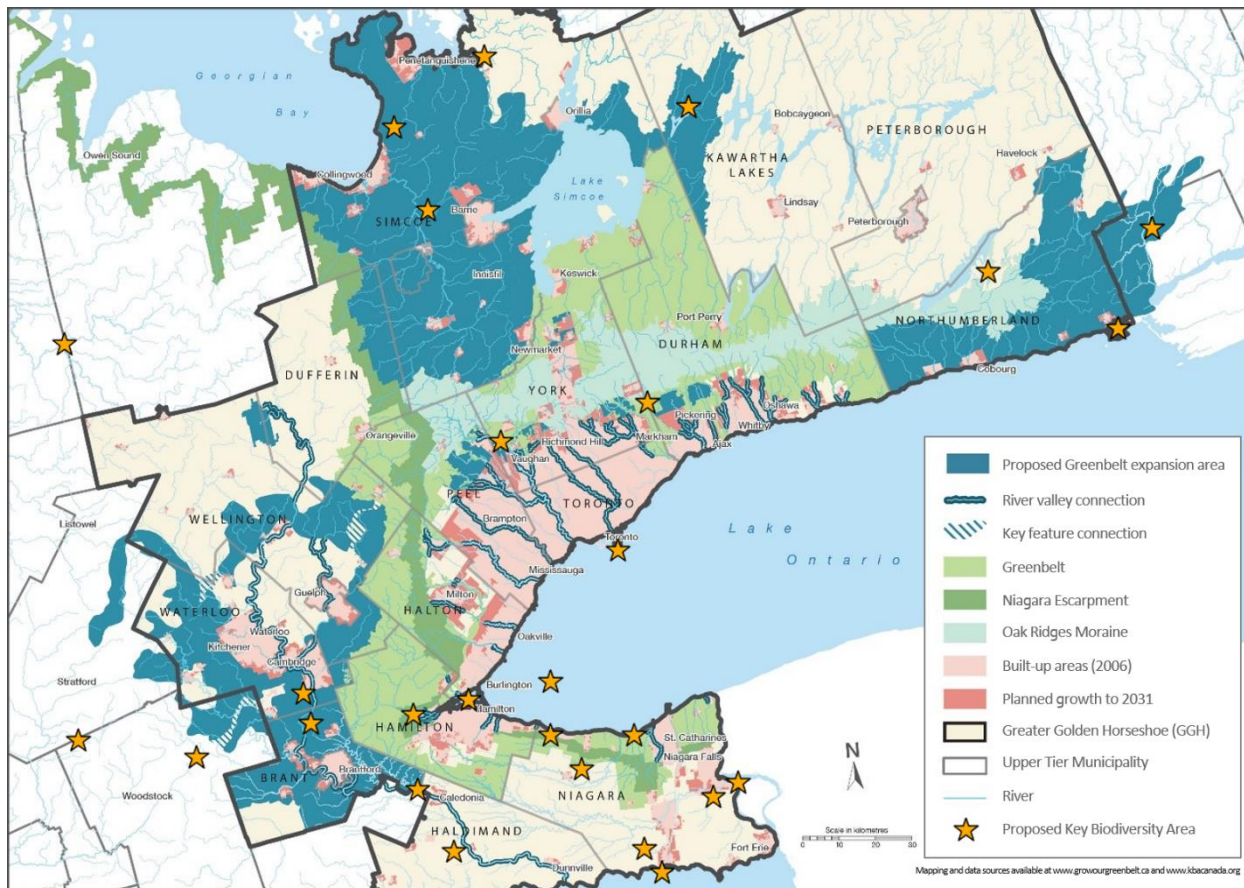
Places that should be included in Greenbelt expansion

Expansion of the Greenbelt should focus on protecting areas of high ecological and hydrological value as well as agricultural lands that are under threat from urban development. More specifically, we recommend the following (based largely on the still outstanding and unaddressed Bluebelt proposal supported by 50 organizations in 2021.⁶ See map below.):

- i. Add all **moraines** in the GGH to the Greenbelt. Moraines store, cool and clean water, providing groundwater recharge and discharge. Many communities in moraine areas are dependent on these moraines for all 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 redbelt 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

⁶ <https://view.publitas.com/on-nature/growing-the-greenbelt-april-2021/page/1>

- Duffins and Carruthers Creeks). The headwaters of the Grand River and other rivers being considered for URV 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.
 - 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.
 - vi. Include **Key Biodiversity Areas**, which are areas critical to the persistence of wildlife. Key Biodiversity Areas are globally and nationally recognized for their importance to rare and at-risk species and ecosystems. For example, Minesing Wetlands in Simcoe County is a proposed Key Biodiversity Area for being the only site in Canada with the globally rare Hine's Emerald dragonfly. The current Greenbelt already captures some Key Biodiversity Areas like the Rouge River Valley, but expanding the Greenbelt according to the above recommendations would capture most other Key Biodiversity Areas in the GGH. Including Key Biodiversity Areas will help prevent the loss of Ontario's unique species and ecosystems, and provide opportunities for Ontarians to enjoy and learn from nature in these remarkable places.



Map of the proposed 'Bluebelt,' for consideration in Greenbelt expansion (Oak Ridges Moraine Partnership, 2018), with the addition of proposed Key Biodiversity Areas

Summary of recommendations

1. We recommend that MMAH add all river valleys that connect the Greenbelt's protected countryside to the Great Lakes and inland lakes as URVs, including: the Nith, Grand, Conestogo, Eramosa, Speed, Nottawasaga, East Holland, Talbot and Ganaraska Rivers, and Duffins, Carruthers, Twelve Mile, Gages and Cobourg Creeks.
2. We recommend that MMAH designate entire river valley corridors as URVs, including both public and private lands, to better sustain the benefits provided by these important water bodies.
3. We recommend that Greenbelt policy be amended to include private lands in the URV designation.
4. We recommend that MMAH proceed as originally proposed with adding the Paris Galt Moraine to the Greenbelt.
5. We recommend that MMAH uphold the government's repeated promise to protect the Greenbelt by cancelling plans to build Highway 413, the Bradford Bypass and the 404 extension.
6. We recommend that the Greenbelt be expanded to include all GGH moraines, wetlands, coldwater streams and headwaters, the former Glacial Lake Algonquin

and Iroquois Shorelines and Plain, the Lake Simcoe basin and northern Simcoe County, as outlined in the Bluebelt proposal.

7. We recommend that the Greenbelt be expanded to include nationally and globally recognized Key Biodiversity Areas in order to prevent biodiversity loss in the GGH.

Concluding remarks

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. 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. With regard to biodiversity more specifically, many plant and animal species will be at increasingly high risk of extinction as global temperatures rise. The Greenbelt and surrounding area host many sites that that will be proposed as Key Biodiversity Areas because of the nationally and globally significant wildlife and ecological processes that they support. The loss of any of these sites will seriously and immediately jeopardize the future of some Canadian wildlife. Greenbelt expansion will help to safeguard these critical sites, and natural corridors to facilitate species movement and adaptation in response to habitat loss and degradation, changing food webs and other climate-related stressors.

Given growth forecasts and the pace of development approvals in the Greater Golden Horseshoe, steps must be taken to protect the lands and waters that sustain us. The protection of natural and hydrological systems and farmland must be prioritized. 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.

We urge MMAH to abandon its unambitious, narrowly scoped phase 2 proposal and seize the opportunity to take meaningful, effective action in line with our recommendations above to enhance the health, well-being and security of millions of Ontarians living in the GGH, now and in the future.

Thank you for your consideration,

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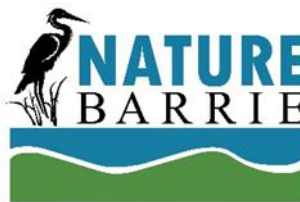
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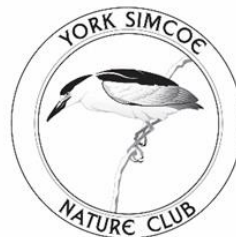
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