

Minister Steve Clark and  
the Environmental Registry of Ontario  
Ministry of Municipal Affairs and Housing  
PDF via ERO website, [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca),  
and [greenbeltconsultation@ontario.ca](mailto:greenbeltconsultation@ontario.ca)

April 19, 2021

**RE: ERO 019-3136 -- Growing the Size of the Greenbelt**

The Ontario Headwaters Institute and the signatories from Regional Resilience, a project to facilitate participation in this consultation, commend the Province for this initiative to grow the Greenbelt.

As you will be aware, more than 120 participants in Regional Resilience have already forwarded their support for our recommendations, consisting of about 750 words, to you via e-mail between March 31 and today. This 25-page submission makes no changes to those recommendations and provides the full context for those recommendations.

Created in 2005, Ontario's Greenbelt includes the Oak Ridges Moraine Conservation Plan area and the Niagara Escarpment Plan area, as well as the Greenbelt's protected countryside.

The Greenbelt extends beyond these significant landforms to protect natural heritage systems, water systems and agricultural systems within the Greater Toronto Hamilton Area. A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan) directs urbanization to settlement areas and designated greenfield areas, to support managed growth throughout the Greater Golden Horseshoe.

Together, the Greenbelt and Growth Plan provide a framework to support population and employment growth while protecting natural assets essential for sustainable prosperity. The Greenbelt protects valuable ecosystem services including clean water, contributes to the \$49B provincial agriculture and agri-food sector, supports nature & biodiversity, and encourages complete communities.

Currently, however, the Greenbelt covers only 21% of the lands in the Greater Golden Horseshoe. Growing the Greenbelt throughout the region will add resilience to the broader local ecosystem while helping to safeguard its ecological integrity, social vitality, and economic prosperity.

While Ontario has a proud history of wise land-use planning and world-class leadership in watershed management, recent reductions in environmental protection are creating uncertainty and skepticism.

The timing of this initiative, therefore, could not be more appropriate.

**We urge the province to grow the Greenbelt in the following areas:**

- **The Paris-Galt Moraine;**
- **More Urban River Valleys (URVs), including those in Appendix A2, and ensuring the inclusion of the headwaters of all the URVs;**
- **Natural Heritage System across the Greater Golden Horseshoe;**
- **Agricultural System in the Greater Golden Horseshoe;**
- **Lands and waters in the Bluebelt proposal; and,**
- **Key headwater areas not included above.**

We do not consider these recommendations and those below to be aspirational for some distant future: they are needed now.

**We urge you to embrace this once-in-a-generation opportunity to safeguard our regional resilience by substantially extending the Greenbelt into the broader area of the Greater Golden Horseshoe.**

Sincerely,

*Andrew McCammon*

Executive Director

ccs to selected MPPs, agency staff, sister organizations, and others

## Responses to Questions

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

The Paris Galt Moraine is an excellent choice for the government to begin growing the Greenbelt. There are significant recharge areas in and around the Paris Galt Moraine that are under pressure from increasing urbanization and other development in the Grand River Watershed. As more than 800,000 people living in the watershed are dependent on groundwater resources, protecting the Natural Heritage System and hydrological function of the moraine is important for human health and a resilient future.<sup>1</sup>

**We recommend growing the Greenbelt to incorporate the Paris Galt Moraine, including headwater areas as noted in Appendix A.**

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

Efforts to define a boundary for the Paris Galt Moraine should be based upon:

- A thorough, evidence-based understanding of the water resource system including groundwater systems, key hydrological areas, recharge and discharge areas, and well-head protection areas;
- Ensuring all key hydrologic features are captured in the defined boundary;
- The engagement of appropriate Indigenous Peoples in a process that respects and honours Canada's constitutional and treaty obligations and moves forward in a spirit of reconciliation;
- In-person public consultation throughout the watershed to discuss proposed boundaries once the pandemic has abated; and,
- Clear and easy-to-implement options for properties outside a proposed boundary to be added to the Greenbelt.

**We recommend:**

- **A science-based approach to define the boundary;**
- **Protecting all key hydrologic features and functions;**
- **Engaging meaningfully with Indigenous Peoples;**
- **Conducting in-person consultations once suggested boundaries are identified and the pandemic has subsided; and,**
- **Developing clear and easy-to-implement options for property outside the boundary to be added.**

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

Expanding the Greenbelt into Urban River Valleys is an excellent way to increase the area of protected lands and hydrologic features, provide migration corridors for numerous species, and establish direct connections with downstream urban communities. We also suggest that URVs be bookended by ensuring that the Greenbelt includes headwater areas.

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<sup>1</sup> <https://guelph.ca/wp-content/uploads/Presentation-Paris-Galt-Moraine-Hydrogeology.pdf>

Additional benefits of establishing more Urban River Valleys include:

- Maintaining green infrastructure such as wetlands, floodplains, and riparian edge;
- Enhancing habitat and biodiversity;
- Supporting a regional trail system;
- Protecting downstream areas from flooding, erosion, and excessive sedimentation;
- Providing healthy outdoor recreation opportunities; and,
- Protecting cultural heritage sites.

**We recommend the expansion of URVs to incorporate connections to the Paris Galt Moraine through the Speed and Eramosa Rivers in urban areas as indicated on the maps in the appendices below. We further recommend adding the following as Urban River Valleys:**

- **Lake Simcoe recharge areas including the Severn Sound and Carden Alvar, Waverly Upland, Clearview Township, Holland River;**
- **Lake Iroquois shoreline areas; and,**
- **The Nottawasaga watershed.**

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

We suggest that the Province can enhance not only the size but also the biodiversity, connectivity, and functions of natural heritage features, and improve the ecological integrity, social vitality, and economic prosperity of the broader Greater Golden Horseshoe by adding the Natural Heritage System identified in the Growth Plan to the Greenbelt.

Natural Heritage System features throughout the GGH perform essential services as they:

- Provide clean air, water storage and filtration;
- Maintain resilience to climate change, invasive species, flooding and soil erosion;
- Contribute to biodiversity conservation and recovery;
- Sustain the water resource system including groundwater water quality and quantity critical for downstream cities and economic activities; and,
- Support agriculture, recreation, tourism, and rural communities.

Much of the Natural Heritage System is contiguous to the Greenbelt, and where it is not contiguous should not be criteria for excluding it from the Greenbelt.

Indeed, these important natural heritage features should be afforded the same protection for the consistency of long-term planning and inter-generational equity.

Given current population, development, climate, and natural heritage challenges, we believe that a more consistent and connected approach to ecosystem protection is warranted.<sup>2</sup>

**We urge the Province to undertake studies and consultations with a view to adding areas in the GGH Natural Heritage System, areas in the Bluebelt map, and any other headwater areas not captured in that mapping to the Greenbelt.**

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<sup>2</sup> <https://ontarionature.org/wp-content/uploads/2018/03/EBR-013-1014-Proposed-Natural-Heritage-System-for-the-GGH.pdf>

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

### Growth Management

The Greenbelt and A Place to Grow Plan are designed to balance each other. The Growth Plan identifies where to grow in the Greater Golden Horseshoe. The Greenbelt Plan identifies where urban growth should not occur to support agriculture, natural resources, and the rural economy for a balanced, sustainable region.

Millions more people are forecast to move into the region in the next 30 years. With residential land selling for over \$1 million an acre in the GTA, it is exceedingly difficult to build affordable housing on greenfield land without government subsidies.<sup>3</sup>

Since 2006, growth planning projections for people and jobs have consistently been too high for all regions, excluding Brampton, Mississauga, and the City of Toronto due to the higher rates of growth in these urban areas. Despite this knowledge, provincial policies require municipalities to allocate more land than needed due to changes to the Growth Plan. Meanwhile, research indicates there is more than enough land to meet our housing needs to 2041 and beyond.<sup>4</sup>

These policy contradictions were further entrenched in the 2019 A Place to Grow Plan, in which the province reduced intensification rates and decreased designated greenfield density targets from the 2017 Growth Plan - despite housing trends, transit ridership requirements and demographic data supporting higher rates.

These policy changes encourage land speculation and support sprawl. As noted by a former Environmental Commissioner in *Sprawl is Ontario's Oil Sands*, this places private interests ahead of the public interest.<sup>5</sup>

Regional governments are busy calculating land needs to 2051. As evident by the Region of York's report to Council on land needs and growth forecasts no expansions into the Greenbelt are required to 2051 but settlement boundary expansions will pave over valuable and finite class 1 farmland.<sup>6</sup> As York Region has the highest allocation of employment and population growth in the GTHA, this finding is likely indicative of what other Region's will experience.

Supporting higher levels of intensification within existing cities and higher density targets in designated greenfield areas uses land more efficiently. Urban growth needs services and systems to support it. These urban systems are increasingly expensive and in the case of greenfield growth interfere with the ability to develop affordable housing.

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<sup>3</sup> <https://www.nytimes.com/2019/07/09/business/affordable-housing-luxury-development-gentrification.html>

<sup>4</sup> <https://neptis.org/publications/update-total-land-supply-even-more-land-available-homes-and-jobs-greater-golden>

<sup>5</sup> <https://saxefacts.com/urban-sprawl-ontarios-oil-sands/>

<sup>6</sup> <https://yorkpublishing.escribemeetings.com/FileStream.ashx?DocumentId=20138>

By supporting a 60% intensification and 80 people and jobs per hectare density rate for designated growth areas (the rate needed to support regular bus service) and an expansion of the Greenbelt, more affordable urban growth could be achieved, and costly urban boundary expansions could likely be avoided beyond 2051.

To our perspective, the removal of environmental and social considerations in the 2019 Growth Plan has upset the historic balances between natural heritage and development, and between private and public interests. Growing the Greenbelt presents an opportunity to restore the equilibriums and build a more resilient Greater Golden Horseshoe.

**We recommend the province address the issues in the Growth Plan noted above and prioritize growing the Greenbelt to reduce land speculation, limit extending expensive urban services into the countryside, avoid increased municipal debt loads, and reduce challenges to affordable housing.**

### Transportation and Infrastructure

Several transportation and infrastructure projects are undermining the Greenbelt's protected countryside by fragmenting agricultural systems and impacting natural heritage systems, including the GTA West highway, Bradford Bypass, and the Niagara Mid-Peninsula Highway.

If built, these highways will affect environmental health, increase climate change emissions, negatively impact the Natural Heritage and Agricultural Systems in the Greater Golden Horseshoe area, and do little to reduce congestion.<sup>7</sup>

Sprawling low density development on the edge of the Greenbelt, supposedly linked to these highways, is not only contrary to the intent of Growth Plan policies that encourage transit supportive complete communities, it encourages more people to drive, thereby exacerbating road congestion, gridlock, and greenhouse gas emissions.

Studies also demonstrate that highways such as these, through whitebelt areas, spur land speculation and may lead to prematurely opening up lands for low density greenfield development before existing urban areas are built to higher densities.

Policies in the Greenbelt Plan allow infrastructure but fail to consider cumulative impacts of infrastructure and neglect to capture land value as suburban, industrial, and commercial development is not permitted within the protected countryside.

We are encouraged by policies in the Growth Plan that prioritize transit as a transportation option for moving people but consider it inefficient and fiscally imprudent to locate transit stations in the protected countryside, such as Gormley Station. A density of 150 people and jobs per hectare is required to support GO train service. Transit stations should be directed to existing built up settlement areas where intensification may occur.

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<sup>7</sup> <https://d36rd3gki5z3d3.cloudfront.net/wp-content/uploads/2021/02/2021-02-03-GTA-West-EA-request.pdf>

In addition, COVID-19 has shifted employment models with more people working from home, reducing highway congestion.<sup>8</sup> These changing patterns need to be incorporated into revised GGH transportation models.

**As the province considers growing the Greenbelt, we recommend that it prioritize the alignment of mobility infrastructure with existing built up urban areas and rescind projects that encourage urban growth in the protected countryside and prime agricultural areas including:**

- **Cancelling the GTA West, Bradford Bypass, Niagara Mid-Peninsula Highways;**
- **Rescinding plans to build transit stations in the Greenbelt; and,**
- **Updating transportation models with Post-COVID commuting data.**

### Natural Heritage System

The Natural Heritage System includes interconnected features and functions including but not limited to:

- Wetlands;
- Fish habitat;
- Significant woodlands;
- Alvars, savannahs and meadows;
- Endangered and threatened species habitat;
- Areas of Natural and Scientific Interest; and,
- Valley and stream corridors as well as the shorelines of lakes.

The Natural Heritage System supports the clean water required for farming and the rural economy, while over a million people in towns across the region rely on groundwater systems.

By growing the Greenbelt along the Natural Heritage System, the Province can enhance not only the size, but the biodiversity, connectivity and functions of natural heritage features and functions, and improve the environmental health, social vitality, and economic prosperity of the region.

Using best practices in ecological land classification, we urge the Province to undertake studies and consultations to identify strengthen connectivity between features in headwater areas and improve the function of the NHS. Adding both key headwater areas and wetland features to the Greenbelt is essential for regional resilience. Candidate areas are captured in the Bluebelt map in Appendix A.

**As noted in Question 4, we recommend growing the Greenbelt by incorporating lands and key hydrologic features identified in the GGH Natural Heritage System, including headwater areas and areas identified by Conservation Authorities and municipal mapping.**

**In addition, while municipalities across the region have variations in their natural heritage and agricultural policies, and while the Greenbelt Plan requires municipal plans to conform to it,**

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<sup>8</sup> [https://ehq-production-canada.s3.ca-central-1.amazonaws.com/4e07dcba9779bacc253239d90ac2bc64f6ce7355/original/1611071955/Final-COVID-Paper\\_NL\\_PF\\_1Jan2021.pdf\\_9ce8ad13d3bf711b8bda0e336172fefe?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIAIBJCUK4Z04WUUA%2F20210326%2Fca-central-1%2Fs3%2Faws4\\_request&X-Amz-Date=20210326T204055Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=56f334eae8eef96273858df50efc7d7a37fa46db7064bae13597be79d22e2abb](https://ehq-production-canada.s3.ca-central-1.amazonaws.com/4e07dcba9779bacc253239d90ac2bc64f6ce7355/original/1611071955/Final-COVID-Paper_NL_PF_1Jan2021.pdf_9ce8ad13d3bf711b8bda0e336172fefe?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIAIBJCUK4Z04WUUA%2F20210326%2Fca-central-1%2Fs3%2Faws4_request&X-Amz-Date=20210326T204055Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=56f334eae8eef96273858df50efc7d7a37fa46db7064bae13597be79d22e2abb)

**we urge the provincial government to allow for regional variations and, where there are conflicts between municipal and provincial policies regarding water and natural heritage policies, the more restrictive or protective policy should apply.**

### Agriculture

Balancing provincial priorities to support a robust agricultural sector is consistent with Growing the Greenbelt across the Greater Golden Horseshoe. Prime agricultural land is a finite resource. The agri-food sector in Ontario contributes \$47 billion to GDP and employs over 800,000 people.<sup>9</sup> Growing the Greenbelt through the Agricultural System will help to address:

- Farmland loss;
- Fragmentation of agriculture lands;
- Food security;
- Long term viability of farming and the agri-food sector;
- Support rural economic development; and,
- Sustainable agriculture and soil health.

**We support the submission made by the Ontario Farmland Trust to grow the Greenbelt across the GGH Agricultural system.<sup>10</sup>**

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

We encourage the province to consider the following priorities as it undertakes to Grow the Greenbelt. It is critical to embrace a multi-faceted approach to regional resilience, building a decision-making framework to ensure inter-generational ecological integrity, social wellbeing, and economic prosperity.

### Health and Wellbeing

Research indicates 20 to 30 minutes in nature leads to better health, including better management of blood pressure, diabetes, mental health, stress, and improved immune response. People sleep better, concentration and sense of well-being are improved.<sup>11</sup>

In addition, the current experience with COVID-19 has underlined how vital the natural environment is for public health, wellness, and recreational purposes. As increased thousands of people have walked trails and visited open parks over the last year, the connection between nature and mental health has never been more evident.

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These emerging realities are a wake-up call for planning and government to prioritize access to nature.<sup>12</sup> Building a Greenbelt trail system fills the renewed prescription for accessible recreational spaces in nature.

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<sup>9</sup> <https://ofa.on.ca/newsroom/ofa-delivers-state-of-ontarios-agri-food-sector-at-queens-park/>

<sup>10</sup> [https://ontariofarmlandtrust.ca/wp-content/uploads/2020/12/OntarioFarmlandTrust\\_ERO-019-3136.pdf](https://ontariofarmlandtrust.ca/wp-content/uploads/2020/12/OntarioFarmlandTrust_ERO-019-3136.pdf)

<sup>11</sup> <https://www.thestar.com/news/gta/2021/02/22/ontario-doctors-set-to-turn-over-a-new-leaf-with-program-that-lets-them-prescribe-nature-to-ailing-patients.html>

<sup>12</sup> <https://www.utoronto.ca/news/walk-park-how-spending-time-nature-can-boost-mental-health>

**Growing the Greenbelt along natural heritage systems is a cost-effective way to address mental and physical wellbeing.**

Climate Change and Biodiversity

Expanding Ontario's Greenbelt into the GGH is key to a more resilient region.

Across the world, climate change and climate related disasters are an increasing reality, from severe floods to devastating fires as experienced in Australia and California. Climate change is also a threat multiplier, and experts are documenting the links between climate change, invasive species, the loss of biodiversity, and the on-set of a sixth mass extinction.

In the face of these pressures, the Greenbelt's natural heritage system provides an extensive reservoir of free natural infrastructure. Forests, rivers, and wetlands filter the water and air, decrease temperatures, prevent floods, reduce soil erosion, support biodiversity, and absorb carbon. Urban river valleys provide an important area where city dwellers can beat the heat free of charge.

**Growing the Greenbelt via the Paris Galt Moraine, URVs, the Bluebelt, and through the GGH's Natural Heritage and Agricultural Systems will build the regional resilience needed to mitigate the changing climate and challenges to biodiversity.**

Regional Prosperity

Overall, we are deeply concerned about the narrow focus of this consultation on the size of the Greenbelt and the general prohibition of policy considerations.

Since 2018, a large number of policy changes have been made that benefit private interests, such as streamlining the Environmental Assessment Act while weakening the Growth Plan, the Species At Risk Act, the Provincial Policy Statement (PPS), and the mandate of conservation authorities. More recently, the government has increased the use of MZOs and seeks, in Bill 257, to exempt MZOs from the PPS.

Without this extension, we expect our long-term regional resilience to decline, including terrestrial and aquatic habitat, water quality, the viability of farming, and the rural economy. In order to restore balance in the region and support well-being and prosperity, we encourage the province to grow the Greenbelt into the GGH.

**We recommend that the Province consider the health and sustainable prosperity of the broader GGH as it consults on Growing the Greenbelt, thereby extending resilience and policy consistency to the entire region.**

**In addition, we encourage the government to pursue a wide-ranging set of new policies to embrace a fair and green recovery and secure regional resilience, thereby protecting ecological integrity, social vitality, and economic prosperity.**

## Aggregates

While new aggregate extraction in the Greenbelt is not permitted in significant wetlands, the habitat of endangered species, and significant woodlands, future aggregate operations may be permitted in key natural heritage features and prime agricultural areas.

Over the past four decades, and following numerous background studies and policy reviews, the provincial interest in aggregate resource management has remained strong.<sup>13</sup> There is a provincial mandate to ensure that aggregate resources are protected for long-term use, and the province has declared a provincial interest in maintaining close-to-market supply.

Cumulative environmental concerns, however, led the Environmental Commissioner of Ontario to call on the Province in 2017 to decrease aggregate demand, strengthen the province's powers to protect the environment, and improve rehabilitation rates through better enforcement.

Instead, the province continued to prioritize aggregate production over natural heritage policies.

According to the Canadian Environmental Law Association, in 2019 the Province reduced the regulatory burden by providing preferential treatment to the aggregate industry rather than support good planning by balancing public and private interests.<sup>14</sup> And in 2020 changes to the PPS enhanced policies to protect existing and planned aggregate industrial uses.

Aggregate extraction imposes cost on society: it affects our health, increases GHGs, puts the clean water resources of Ontario communities at risk, and damages natural heritage systems.

**We support comments by Greenbelt stakeholders to prohibit new aggregate extraction throughout the Natural Heritage System within and outside the Greenbelt.**

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[https://www.ossqa.com/coordinated\\_provincial\\_plan\\_review\\_summary/spotlight.go?spotlight\\_id=421&component\\_type=text\\_block&scope=global&q=greenbelt#cid1842id421row421](https://www.ossqa.com/coordinated_provincial_plan_review_summary/spotlight.go?spotlight_id=421&component_type=text_block&scope=global&q=greenbelt#cid1842id421row421)

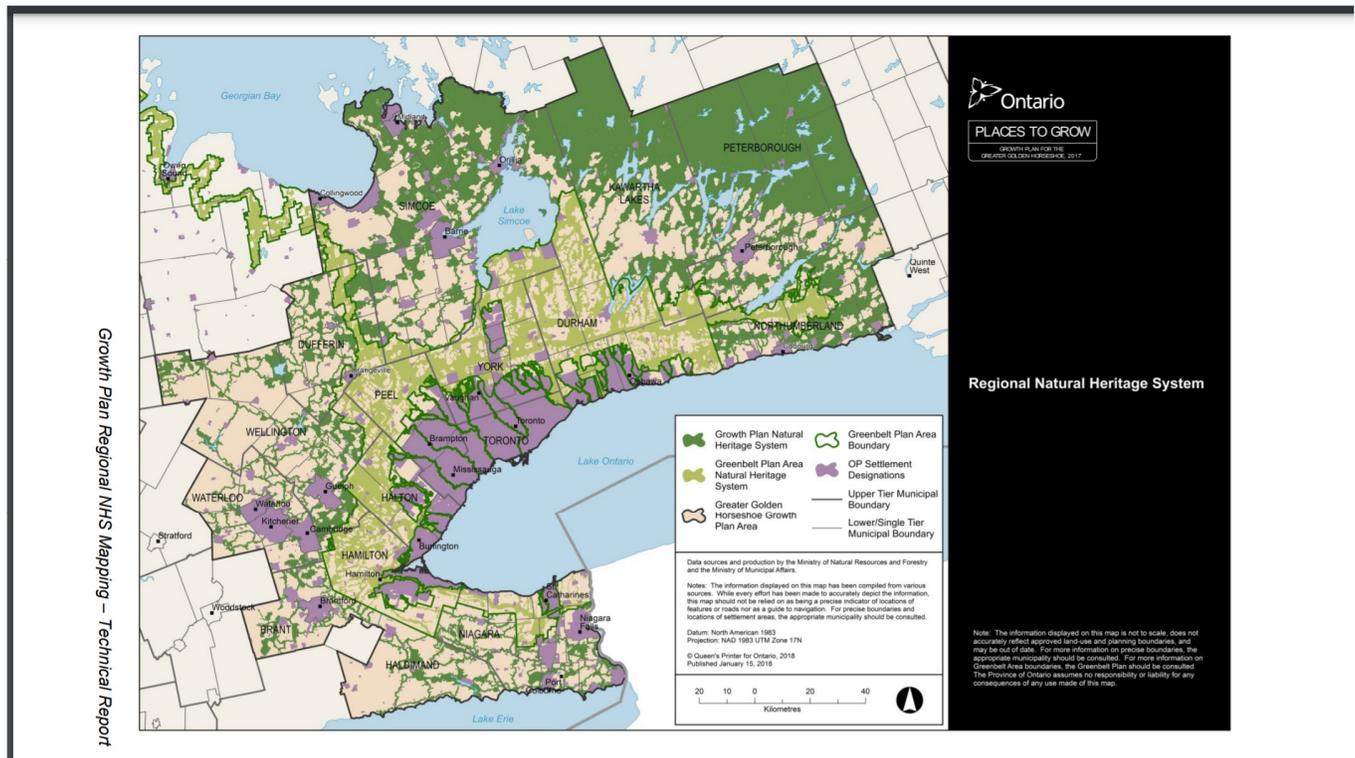
<sup>14</sup> <https://cela.ca/tag/provincial-policy-statement/>

## Appendix A: Available maps posted in the draft submission of March 31

### A.1 Growing the Greenbelt throughout the Natural Heritage System

By growing the Greenbelt throughout the Natural Heritage System in the Growth Plan area, the province would support regional resilience for future generations.

To support local variations among municipalities we urge the government to allow more restrictive NHS policies at the local level and, in instances of conflict between provincial and local policies, the more protective policy should apply, including for aggregate extraction.



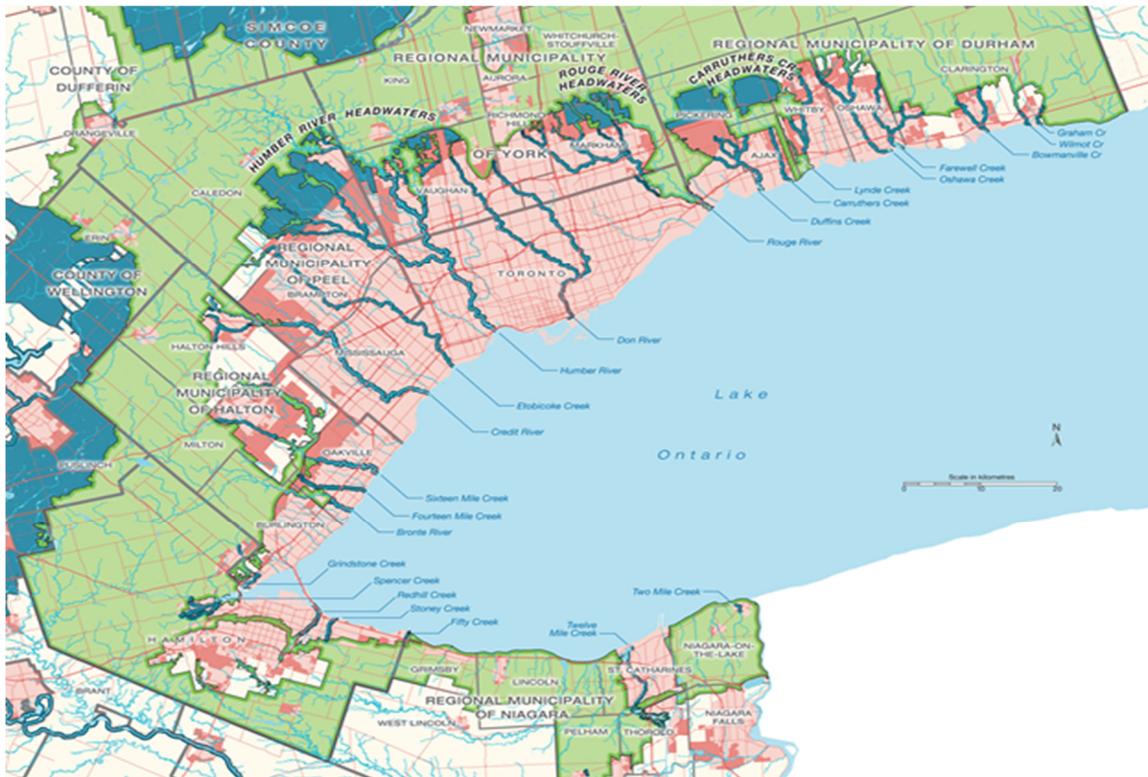
## A.2 Urban River Valleys and Headwaters

Water systems do not differentiate between urban and rural areas. River systems and valleys provide drinking water resources, irrigate crops, provide recreational space, and flow through our communities.

Forested river systems provide important cooling effects necessary for sustaining fish habitat, crops, and communities during hot weather, while wetlands and flood plains absorb and minimize flood waters.

While URVs provide a connection for urban populations that may be geographically distant from the sources of their water in the Greenbelt sources, the province should consider ensuring the protection of their headwaters and publicizing this as a more specific connection to the Greenbelt.

The connection of URVs to their headwater areas would heighten public understanding of the Greenbelt and the ecosystem context needed for regional resilience.



Source: [What's Proposed - Protect our Water \(protectourwaters.ca\)](http://protectourwaters.ca)

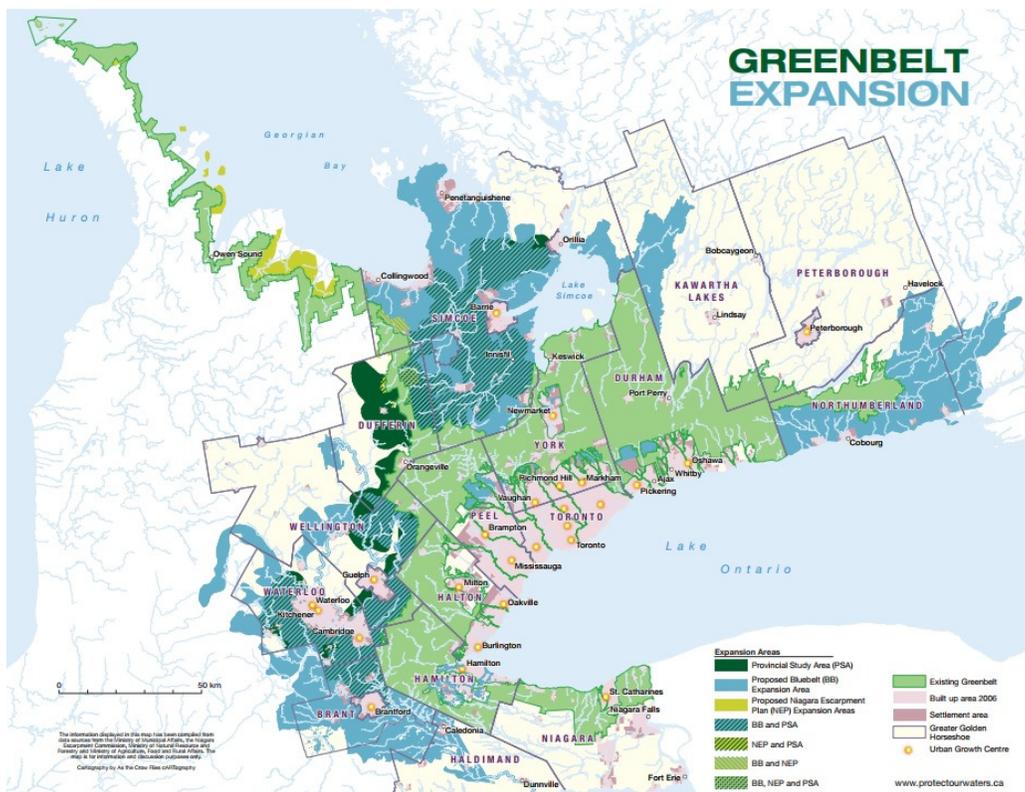
### A.3 The Bluebelt

We support the proposal from the Oak Ridges Moraine Partnership<sup>15</sup> to add the Bluebelt to the Greenbelt. Key additions include but are not limited to:

- The headwaters of the Humber, Don and Rouge rivers;
- Duffins and Carruthers Creeks;
- The south slope of the Oak Ridges Moraine and the Iroquois Shoreline along Lake Ontario in Northumberland County;
- The Luther Marsh; The entirety of the Waterloo and Orangeville moraines in Wellington County;
- Grand River watershed in Brant County; and,
- The remainder of the Lake Simcoe basin as well as vulnerable water resources in the rest of Simcoe County.

Adding these areas to the Greenbelt would help safeguard critical water supplies, natural areas, and prime farmland. Such protection is vital to community health and resilience in the face of increasing population, development, and pressures from climate change and to biodiversity, and limit the impact of future flooding and drought.

Growing the Greenbelt into these areas would also conserve and connect significant wildlife habitats that support many at-risk species such as [redside dace](#), [rapids clubtail](#) dragonfly and [wood turtle](#). It would help address the ongoing destruction and degradation of stream, river, and shoreline habitats which are key threats to these species.



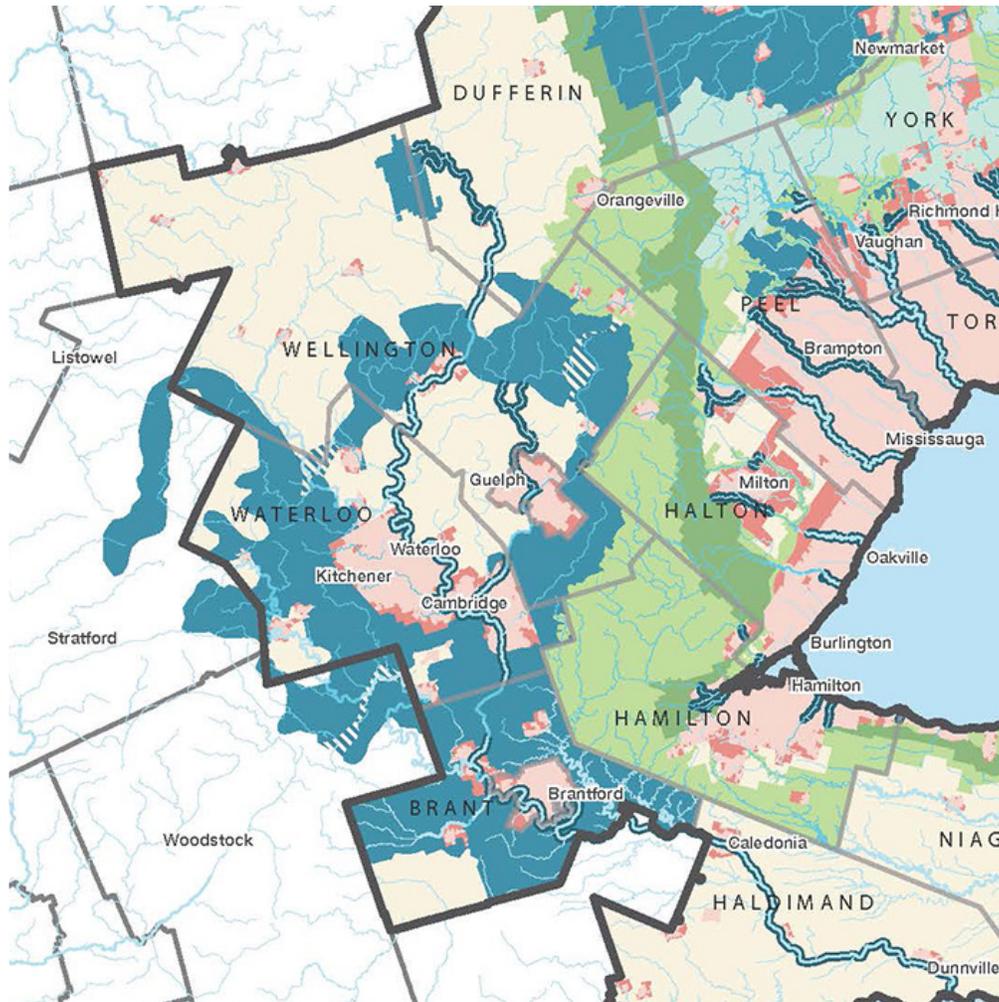
Note: This drawing replaces the drawing in the draft of March 31.

<sup>15</sup> [What's Proposed - Protect our Water \(protectourwaters.ca\)](#)

## A.4 Paris Galt Moraine

The Paris Galt Moraine provides drinking water to over 800,000 people in the Grand River Watershed. By 2041 the population of the area is expected to grow to 1,386,000 - all reliant on groundwater. It is essential that the groundwater system is protected from the cumulative impacts of development in the watershed.

The Natural Heritage System throughout the area, including river valleys, headwaters, wetlands, intermittent streams, and recharge and discharge areas must be protected for watershed resilience. As the Paris Galt Moraine is an area with high value aggregates, provision needs to be made to restrict aggregate taking below the water table within the moraine area. All lands within the agricultural system connected to the hydrological system of the Paris Galt moraine should be included in the Greenbelt.



Source: [What's Proposed - Protect our Water \(protectourwaters.ca\)](http://protectourwaters.ca)

## Appendix B: Summary of Webinars and Maps available after March 31

### Appendix B1: Meeting Summaries

#### Part A: Executive Summary

While there was remarkable consistency from than 300 participants, each session was different. Some had little conversation; some multiple questions; and some a few select discussions of well-informed Greenbelt long-haulers. Key common issues are described below, followed by a detailed description of each webinar.

#### Support to Expand the Greenbelt

Widespread support to expand the Greenbelt included the following:

- **A strong desire to expand the Greenbelt.** While all participants saw the original components of what has become the Greenbelt as being both needed and innovative when they were introduced and evolved, the area of protected lands in South-central Ontario is no longer adequate given the cumulative impact of Ontario's growing population and development, augmented by climate change. Expansion is required to protect natural heritage and biodiversity; water quality, quantity, and temperature, and; regional agriculture – as well as to reduce leap-frog development.
- **Unanimous support to expand the Greenbelt to include the Paris-Galt Moraine and to add Urban River Valleys.** Participants supported not only the Paris-Galt but also other moraines and the numerous URVs cited in our submission. Participants also supported the need to increase the educational profile of URVs as part of the regional eco-system by including their headwaters in outreach material and the need for in-person, post-pandemic meetings to address specific boundaries, as well as to engage Indigenous Peoples;
- **Virtually unanimous support to expand the Greenbelt into the GGH,** particularly to include the Natural Heritage System, the Bluebelt, the Moraines of the STORM report, and the agricultural system. Indeed, the only voices of caution in this regard were to ensure that areas with currently greater local protection than that afforded under the Greenbelt should not lose that protection due to provincial actions.

#### Apprehension about the Government's Environmental Intentions

Years of out-of-balance, pro-development policies under “Open for Business” and the Housing Action Plan have shaken public trust in the government's commitment to environmental protection. It has not helped that many changes were implemented in an absence of public consultation, including in omnibus bills under cloture, and that numerous rights of appeal have been lost, raising apprehension about the government's commitment to democratic and judicial norms. We heard the following:

- The focus on the size of the Greenbelt neglects a needed discussion about the efficacy of Greenbelt policies, the availability of monitoring and performance data, the stability of the agricultural system, governance, and a host of aligned issues such as putting highways through the Greenbelt and sewage effluent into its receiving waters. A consultation on size alone is a missed opportunity;
- The 60-day consultation period was too short and should have included a stipulation that municipalities wishing to make a submission be required to engage their residents; and,
- Overlapping the two bullets above, municipal comments appear to be de facto policy submissions. While we support applying municipal or provincial polices with the higher degree of protection, municipal growth is the number one driver of reduced natural heritage and agricultural lands, and arguing for a status quo of unsustainable planning to accommodate low-density sprawl over a vision for regional resilience is an accidentally biased effort that violates the boundaries of this consultation.

## **Part B: Notes from 11 Webinars**

### Credit Watershed: Credit Headwaters Alliance and others, March 31

- Increased urban growth, whether out or up, will require more source water and generate both more stormwater run-off and more sanitary sewage. We need to find ways to use less water and reduce the impacts of stormwater and sewage on receiving waters, especially upon our smaller streams.
- Aggregate pits and quarries are also impacting ground and surface water, and the issue of slurry below the water-table is under-quantified. Quote: “We are mining aggregates with impunity.”
- Just as we need to protect regional biodiversity, we need to recognize the need for extensive agricultural lands, as not all crops can be grown in every area. i.e. Agricultural biodiversity is an important and fundamental aspect of protecting the Greenbelt.
- It is essential that we have a strong provincial plan as municipalities seem to want to both resist hard urban boundaries and try to tinker with the Greenbelt boundary.
- Quote: “Aggregate policy in Ontario is a gravel truck with no breaks.”
- A big issue is that governments don’t seem to know how to grow in a sustainable manner.
- Most agricultural lands in the Credit are now owned by developers, and most of the rest that is owned by farmers is too expensive to be bought for future agriculture. There are concerns about the succession of agriculture due to high land valuation that has been spurred on by changes to A Place to Grow. The loss of near-urban farmland is a catastrophe in the making.
- In addition to dwindling agricultural lands, much of the Credit is now being tagged for future recreational use, for people in the large municipalities in the south.
- We are at a point where the trends on disappearing agricultural lands and increased recreation in the Greenbelt may make it even more important to protect natural heritage and agricultural lands in the Greater Golder Horseshoe.
- We need hard urban boundaries and less infrastructure in the Greenbelt.

### Full Region: Yours to Protect and the Ontario Greenbelt Alliance, April 1

- There was significant discussion on adding the Bluebelt to the Greenbelt, with detailed support for Northumberland County, the Lake Iroquois shoreline and plain, the Rice Lake Plain, as well as with respect to Simcoe County.
- Participants supported the need for more URVs, including the concept of educational information to tie URVs to their upstream headwater areas.
- It was noted that all existing URVs flow to Lake Ontario and that some thought should be given to similar corridors that flow to Lake Erie and Lake Simcoe.
- Spirited discussion contrasted the approach to protected lands and waters in and around Waterloo with respect to areas near Niagara Falls, with one participant noting that municipal councils around the Falls consider the Greenbelt a hard boundary outside of which everything else should be developed.
- There were also extensive comments about the credibility of Greenbelt polices that are not providing the protection needed, especially on sewage effluent, road run-off, transit hubs, and highways proposed to be built in the Greenbelt.

## Halton Region: Halton Environment Network, April 6

- Most of the discussion for Halton focused on the Natural Heritage System. Question and answers clarified that the establishment of the NHS throughout the Greenbelt and the GGH was meant to provide both a critical mass of natural area, resources, and species protection, as well as to maintain connectivity vs fragmentation of habitat that would present challenges for migrating species.
- Discussion also described that the Natural Heritage Systems in the Greenbelt and the GGH were in fact connected. Participants seemed to understand and endorse that, while on the one hand it is logical to extend protection of the NHS into the GGH, as it is one system, the NHS across the whole region would be impacted if the NHS in the Greenbelt was reduced or compromised.
- A subsidiary discussion - perhaps based on the fact that the Halton region generated the first amendment to the Greenbelt, as well as a local debate about the possible protection of the Glen Abbey golf course lands - was held on if URVs are part of the NHS. The answer here is that, by definition, a URV has to connect to the Greenbelt.
- This led in turn to a further discussion, also based on participant interest in Glen Abbey, on whether the Greenbelt might also include cultural heritage lands. The facilitators indicated a receptivity to discussing this concept, but felt a priority would be to establish protocols to embrace more First Nations lands, such as the archeological sites of Huron-Wendat villages or the Carry Place Trail, before adding early settler sites.
- Finally, concerns were expressed about perceived abdications of provincial responsibility for environmental protection, particularly for pollution, algae, and cyanobacteria, and if there was any prospect of appealing to the federal government. The facilitators described the federal / provincial division of powers and that most aspects of natural resource management falls to the latter, but noted that issues with significant public engagement might entice federal involvement.

## South Durham: Land Over Landings, April 7

- Desires and obstacles were expressed regarding the possible inclusion of portions of the Whitevale Marsh, areas that are adjacent to the Natural Heritage System but slated for low-density development, in the Greenbelt. The facilitators noted that this was possible as it is contiguous with the Greenbelt natural heritage system and urged the participant to make the request.
- A question about whether people could make more than one submission was answered yes, and if a submission would be ignored if it addressed only one question was answered no.
- There was a significant discussion on the role and power of municipalities in the consultation. It was pointed out that:
  - Municipal submissions have great weight with the Province;
  - Municipalities appear to be not interested, and perhaps there was no time, in obtaining input from their residents on this consultation; and,
  - While some municipalities have greater protections than afforded in the Greenbelt plan, which the OHI supports, in general most municipalities are using the consultation as a cudgel to maintain planning protocols that do not address sustainability. This amounts to de facto policy stasis when the consultation is supposed to be about growing the Greenbelt and which essentially prohibits overall discussion on policy, whether the Greenbelt is effective toward its goals, and on governance.
- The discussion above continued to address issues of fill, protecting agricultural lands, MZO's, and schedule 3 of Bill 257 even though that excludes the Greenbelt.
- A final set of concerns were expressed on the need to protect the headwaters of Carruthers Creek, which is a recommendation included in the OHI submission, even though some of these headwater areas are inappropriately included in the White belt and are thus the object of a huge amount of developer interest.

## Lake Simcoe Watershed: Rescue Lake Simcoe Coalition & Simcoe County Greenbelt Coalition, April 8

- Following the OHI PowerPoint, Claire Malcolmson of the Rescue Lake Simcoe Coalition spoke to several local pressures and goals, tying them in particular to the Lake Simcoe Protection Plan and mapping done on varying levels of protection for regional terrestrial natural heritage.
- Discussion began with a question seeking background on why the east side of Lake Simcoe offers Greenbelt protection that is absent from the West side of the lake. Experienced local activists suggested that the mapping was influenced more by development prospects than by environmental priorities.
- It was shared that while people can see and react to a proposed MZO to destroy a provincially significant wetland, the loss of individual parcels of agricultural lands has no analogous alarm system, and that cumulative losses of farmland to expanding development represent a silent but critical challenge.
- Given this critical loss, participants wished there was more systematic approach to protecting farmland.
- In contrast to the threats to the Greenbelt, participants noted the acceptance of the escalating value of agriculture lands, the influence of land speculators, the fallacy of low-density growth paying for itself rather than increasing municipal taxes and debt, and the convenience of increasing road construction instead of funding for multi-modal transportation options.
- This thread continued with observations about how changing plans influence unsustainable growth. This included concerns about putting transit stations into the Greenbelt, highways in to the Greenbelt, and trying to earmark lands for priority industrial and commercial growth, such as along the 404 corridor, which then morph in to under-serviced low-density residential land requiring more roads while generating more GHGs, automotive droppings, and run-off with road salt.
- Notwithstanding the litany of woes that development imposes as outlined above, both Coalitions identified the lack of action on key Lake Simcoe Protection Plan priorities: reduced phosphorus, increased shoreline plantings and protection, and that the Lake Simcoe region clearly needs increased protection for terrestrial natural heritage and agriculture.
- The OHI committed to working with the webinar partners to place a map in Appendix B of our submission to support the addition of lands in the Lake Simcoe area to the Greenbelt.

## The Bluebelt: Various groups from the east side of the GTA (STORM East, Wesleyville etc), April 9

- Following the OHI PowerPoint, Debbe Crandall of STORM outlined key areas that the 2015 Oak Ridges Moraine Partnership identified as part of a regional Bluebelt that could be readily added to the Greenbelt. Areas include the Iroquois plain and shoreline, headwaters in the Oak Ridges Moraine, and parts of Brant County. A session planned for April 14 is to address STORM candidate moraines in the west GGH for Greenbelt inclusion.
- After Debbe, Mark Stabb of the Nature Conservancy provided additional insight on the eastern edge of the Greenbelt, describing the Rice Lake Plain and listing rivers flowing from upland areas to Lake Ontario that are worthy of natural heritage / URV designation.
- Together, Debbe and Mark outlined the importance of most local streams for coldwater fish habitat and as upland sources that emerge downstream to keep the rivers cool. There were also descriptions of how important local engagement is to protecting these habitats; how federal reports can help influence provincial and municipal decision-making; and the threats that Highways 407 and 412 represent by

enticing municipalities to pursue employment or residential development along the transportation corridors, with infrastructure instead of community design driving land use planning.

- Discussion began by noting the province's focus in designating rivers flowing south through populated areas to Lake Ontario as URVs, and not recognizing the importance of rivers flowing north.
- Participants expressed concerns that municipal politicians tend to make short-term decisions for development, employment, and tax revenue with a lack of balance for long-term public interest for natural heritage, clean water, and agriculture, as well as nature-based health and climate change solutions.
- Participants with local knowledge identified Shelter Valley as a key area where agriculture should be preserved.
- Two creative suggestions that emerged included that:
  - We should ask the provincial government to defer requests for MZO in candidate areas for Greenbelt expansion; and,
  - The Province should also be asked to develop primers so that the public can better understand and contribute to monitoring and performance data as well as to the Municipal Conformance Reporting process.
- The OHI committed to working with the webinar partners to place a map in Appendix B of our submission to support the addition of lands in the eastern side of the Bluebelt to the Greenbelt.

#### Youth: Emerging Leaders for Biodiversity & the Community Climate Council, April 12

- Session began with an observation that most suggested expansions were north and west, and a question about an apparent lack of growth in the east. Responses mentioned the focus on moraines, and that eastern candidate lands included both the Iroquois plain and shoreline as well as the regional natural heritage system. There was also mention of Wesleyville and other local areas owned by the province and municipalities.
- There was a robust discussion about a needed symbiosis between urban expansion, climate change, and environmental protection. Issues touched upon density vs sprawl, highways vs transit, housing costs vs commute times, access to urban services and quality of life vs their rural counterparts, and changing values between the generations and as may be shaped by the pandemic. Participants shared observations that trends in changing technology may influence demand over time, altering demand for working at home, demand for cars, and/or increased public transit.
- There was a final, short discussion about the prospect of incorporating natural heritage systems into the Greenbelt. We reiterated that this is already a major aspect of the OHI's presentation, and that the NHS is contiguous throughout the Greenbelt and the GGH.

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## North Durham: Green Durham Association & Ontario Soil Regulation Task Force, April 13

- The presentation description of Greenbelt Plan article 5.3 struck a chord, precipitating discussion on where and how local permitting of aggregates can provide more protection than provincial regulation and underscoring that people should seek comment from local agencies to see if applying the Greenbelt to new areas might in fact weaken existing protection.
- Other concerns noted about aggregate operations were that provincial regulations have changed to allow extraction below the water table, without municipal consent and that fill may be allowed in such areas in the future. People were concerned that efforts to grow the Greenbelt do not excuse harm from aggregates, and remain deeply concerned that groundwater contamination remains a real threat from aggregate taking below the water table.
- On the other hand, it was noted that new provincial regulations slated to come in to force in January on the movement of excess soil will hopefully reduce one of the threats to the Greenbelt, but the protection will still be dependent on municipal site alteration by-laws and aggregate rehabilitation plans.
- There was a discussion about the over-whelming momentum led by developers and municipalities in search of expanded employment lands and taxes that under-values ecological goods and services in a growth model that does not pay its way, increasing municipal debt.
- Further discussion on this point noted the lack of public engagement on policy issues in land use planning. While hundred of organizations often rally to oppose the most grievous of development proposals, and even Schedule 10 of Bill 66, investing in discussions about the Greenbelt and Growth Plan requires time, personnel, and financial resources usually unavailable to most community groups.
- In short, while vested interests in the development and municipal sectors are essentially able to argue for the continuation of existing policies while opposing Greenbelt expansion, those in the environmental community who want to grow and increase protection for the Greenbelt are prohibited from discussing policy issues and were by and large not invited to roundtables or consultations.

## Moraines: STORM Coalition (Save the Oak Ridges Moraine), April 14

- Following the OHI PowerPoint, Debbie Crandall of STORM presented key findings from a STORM report that identifies key moraines outside of the western edge of the Oak Ridges Moraine that are candidate areas for inclusion in an expanded Greenbelt. The report identifies 6 moraines, the Paris-Galt Moraine and 5 others. It is currently available @STORMCoalition and will be posted shortly at [www.stormcoalition.com](http://www.stormcoalition.com).
- Participants found the mapping extremely informative, noted that they were not included in government mapping for the 2017 consultation Protecting Water for Future Generation: Growing the Greenbelt in the Outer Ring; and were strongly in favour supporting the inclusion of these moraines in the Greenbelt based on their importance to natural heritage, water for drinking & agriculture, and as nature-based solutions for climate change and public health.
- Participants expressed concerns about the aggregates in the moraines and desires to extract them versus the needs to protect agriculture over aggregates; the impact of aggregate extraction on water systems; the recently amended but perceived inadequate pricing of water used in aggregate operations; and the prospects of the transition of aggregate operations to industrial use, with potential threats of aquifer contamination.

- Specific aspects on the issue of both pit rehabilitation and industrial use would benefit from the engagement of the Ontario Soil Regulation Task Force.
- In a discussion on how to potentially include the moraines in an expanded Greenbelt, Debbe Crandall noted that not all areas of the Greenbelt have identical policies, and that some municipalities have policies for aggregate operations that exceed the protective measures in the Greenbelt. It was agreed that future consideration of the 6 candidate areas for Greenbelt inclusion need robust discussion on site-specific protective measures.
- The OHI committed to working with the webinar partners to place a map in Appendix B of our submission to support the addition of lands identified in the STORM Moraine report to the Greenbelt.

The Grand Watershed: Grand River Environment Network & Sustainable Brant, April 15, 2021

- Following the main presentation, Kevin Thomason described how, when the Grand was left out of the Greenbelt in 2005, local citizens, elected officials, and agency staff in Waterloo Region built environmental policies that offer stronger environmental protection than are in the provincial plan. As a result, there is strong consensus that greenbelting in the region would in fact reduce existing protocols.
- Richard Tunstall of Sustainable Brant described an opposing reality, in which pro-development councils have facilitated the expropriation of farmland for development and both oppose greenbelting in general and appeals from farmers to have their contiguous land added to the Greenbelt. He also noted that the conversation on growing the Greenbelt is not addressing leap-frog development or food security.
- A participant raised a concern about a proposed bridge over the Grand with little public input. The facilitators suggested this was due to the project being considered infrastructure, like Highway 413, with no consideration of cumulative impact assessment.
- Discussion flagged the need to consider the limitations of this consultation and commit to a longer-term campaign to address huge deficiencies and inequities in land use planning. Some issues, such as various zoning decisions, have been frozen or on-going for many years. The OHI notes that numerous organizations are calling these “zombie” highways, pits, or developments, where public involvement cancels them but they keep coming back to life.
- Discussion also flagged that there was only one provincial webinar on the ERO posting; that MPPs are only in the final week of the 60-day period inviting a few groups to share their perspective but with no dialogue; and that regional webinars have been open only to selective, invitation-only, non-provincial local groups. In fact, invitations were not extended to those who participated in the previous 2017 public consultations on growing the Greenbelt.
- In response to a question also asked in other sessions, participants were re-assured that they could make more than one submission.
- The OHI committed to working with Sustainable Brant to support their submission on the addition of lands in Brant County to the Greenbelt.

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Final Webinar: All welcome and session for the Ontario Environment Network, April 18

- While participants agreed with the addition of GGH Natural Heritage lands to the Greenbelt, there was a discussion about the accuracy of natural heritage mapping and how residents could seek to have mapping errors corrected. The facilitators noted that the mapping was developed locally by municipalities and conservation authorities but approved by the province. It was suggested that a first point of contact would be the local municipality.
- While not a Growing the Greenbelt issue, there was a significant discussion regarding delayed implementation of Official Plans, and in particular how some delays seem to not effect building and road construction but delayed the creation of parks, impacting human health and wildlife.
- This discussion led to the citing of many similar issues, including:
  - Local efforts to fast-track approvals to re-zone agricultural or Greenbelt lands to employment lands, in spite of regional gluts, followed by a trend to convert such lands to residential once the initial zoning change was granted; and.
  - Repeated efforts to expand urban boundaries in lower-tier municipalities, which would apparently welcome debt for low-density infrastructure, into areas of the Protected Countryside.
- As participants wanted to know how to monitor and address concerns of this nature, the facilitators suggested looking at municipal agendas, contacting Councilors and municipal planners, signing up to receive notices on official plan amendments and Municipal Comprehensive Reviews, and looking at planning toolkits on the MMAH website and at organizations such as Environmental Defence Canada.

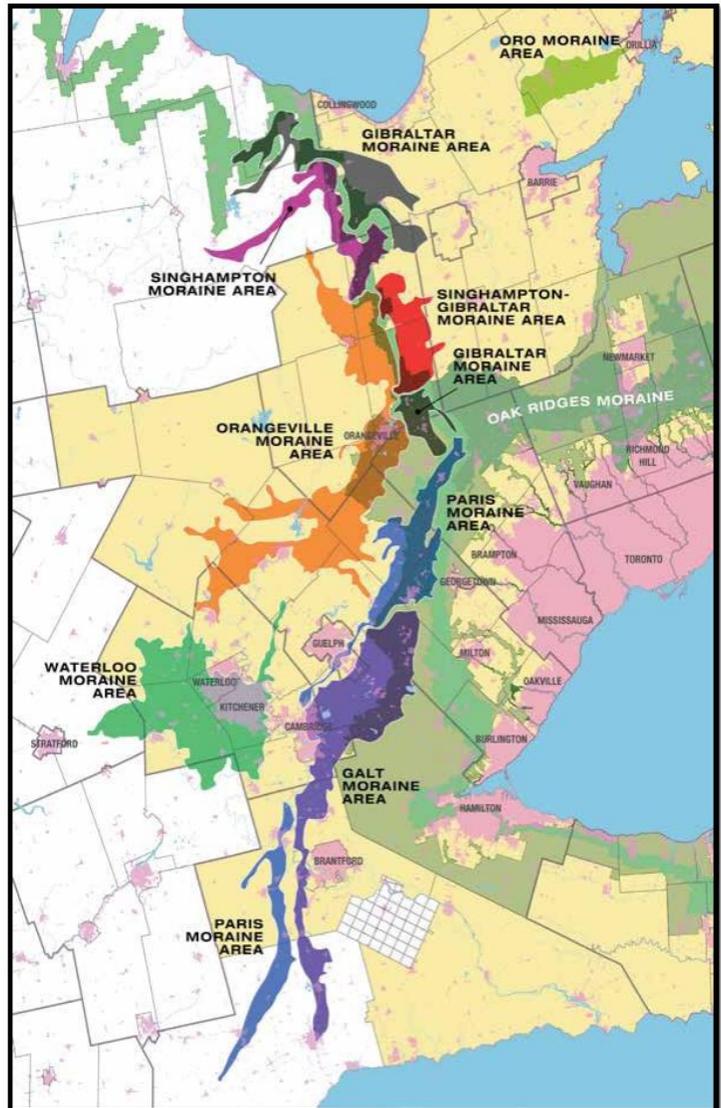
## B2. Moraines of the Greater Golden Horseshoe

The OHI is pleased to support the inclusion of moraines recently identified in a study by the STORM Coalition. While the Paris-Galt Moraine is already being considered, the Province should move quickly to add the other five moraine systems that lie within the GGH, namely the **Oro Moraine**, southern portions of the **Singhampton and Gibraltar Moraines**, the **Orangeville Moraine**, and the **Waterloo Moraine**.

Excerpt from Protecting Our Waters:  
Building a Moraine Movement in the GGH

“Moraines come in all shapes and sizes. The interlobate Oak Ridges Moraine was deposited in the Late Wisconsin stage between the Simcoe and Ontario ice lobes. The ORM is exceptionally large covering 190,000 hectares and coming in at 160 km long. In many areas there are many hundreds of metres of overburden (glacially derived tills and sand, gravel and silt). The other major interlobate moraines in the GGH are the Orangeville, Oro and Waterloo Moraines. The end or recessional Paris-Galt Moraines are equally as important primarily for the role they play in recharging the limestone aquifers that provide drinking water to the City of Guelph and region. The moraine are also sources of groundwater for domestic supplies and for agriculture.

Since Walkerton, there has been a concerted and strategic push from the Ontario Geological Society in partnership with the Geological Survey of Canada and conservation authorities to map the ...



“insides” of these morainic systems to produce three-dimensional stratigraphic models. These focused geotechnical and geophysical studies have provided new insights into the role that recessional moraines play as recharge areas or conduits of groundwater to aquifers below. End moraines are markers of ice fronts that stalled before either advancing or retreating based on climatic conditions. The end moraines in the GGH include the Paris, Galt Singhampton and Gibraltar Moraines.

The report is currently available @STORMCoalition and will be posted shortly at [www.stormcoalition.com](http://www.stormcoalition.com).

### B3. Simcoe County

The OHI supports the positions of the Simcoe County Greenbelt Coalition and the Rescue Lake Simcoe Coalition to extend the Greenbelt to protect is part of the province that is rich with moraines, wetlands, vulnerable shorelines and cool/cold water river systems which are becoming increasingly rare. Furthermore, Simcoe County has a large groundwater system which supplies drinking water for most of the residents within Simcoe County.

We believe that the Greenbelt should be expanded to this region with the following intentions:

- Protecting the remaining 1/3 of the watershed that is not already in the Greenbelt (Figure 1)
- Protecting significant hydrological features in Simcoe County (Figure 2), including:
  - Highly significant recharge areas in Severn Sound and the Carden Alvar
  - Highly significant recharge areas in the Waverley Uplands
  - Wetlands and recharge areas in Clearview Township
  - All highly vulnerable aquifers, significant groundwater recharge areas and locally significant wetlands and moraines in Simcoe County

Figure 1

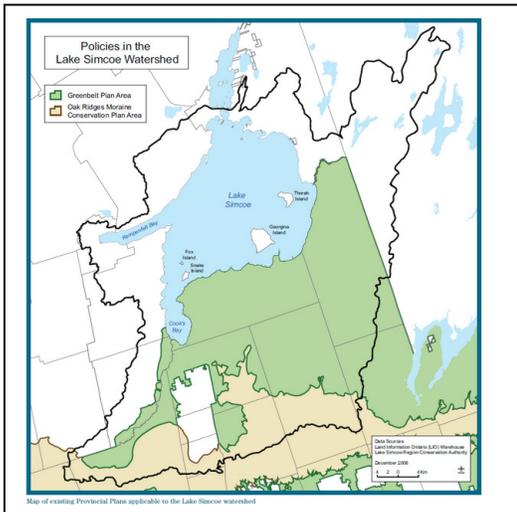
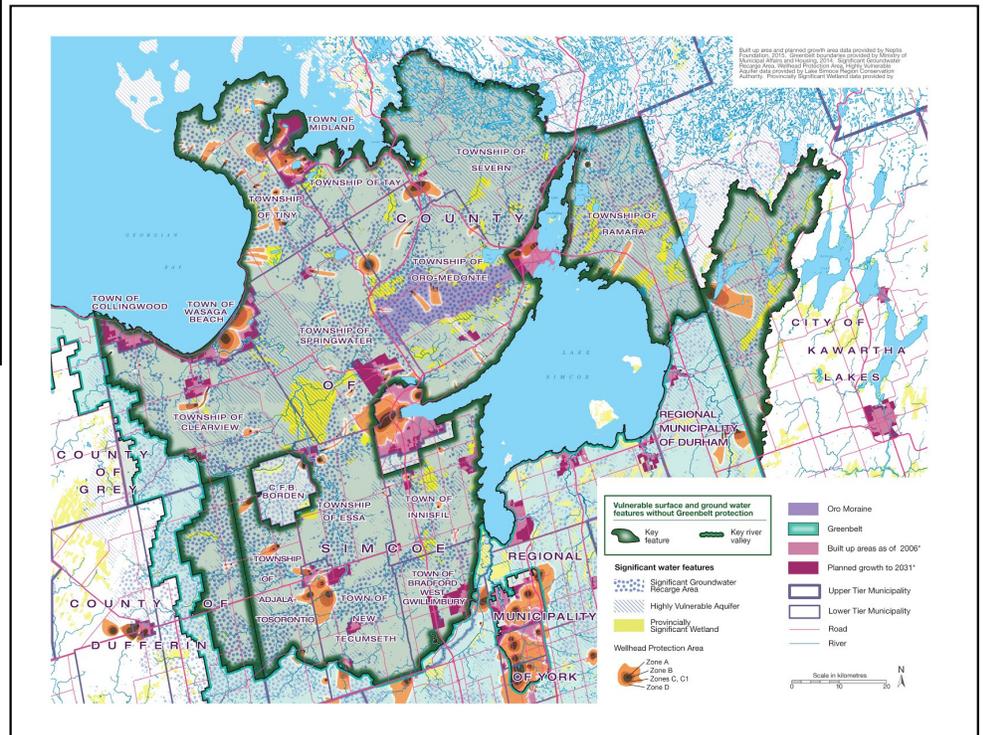


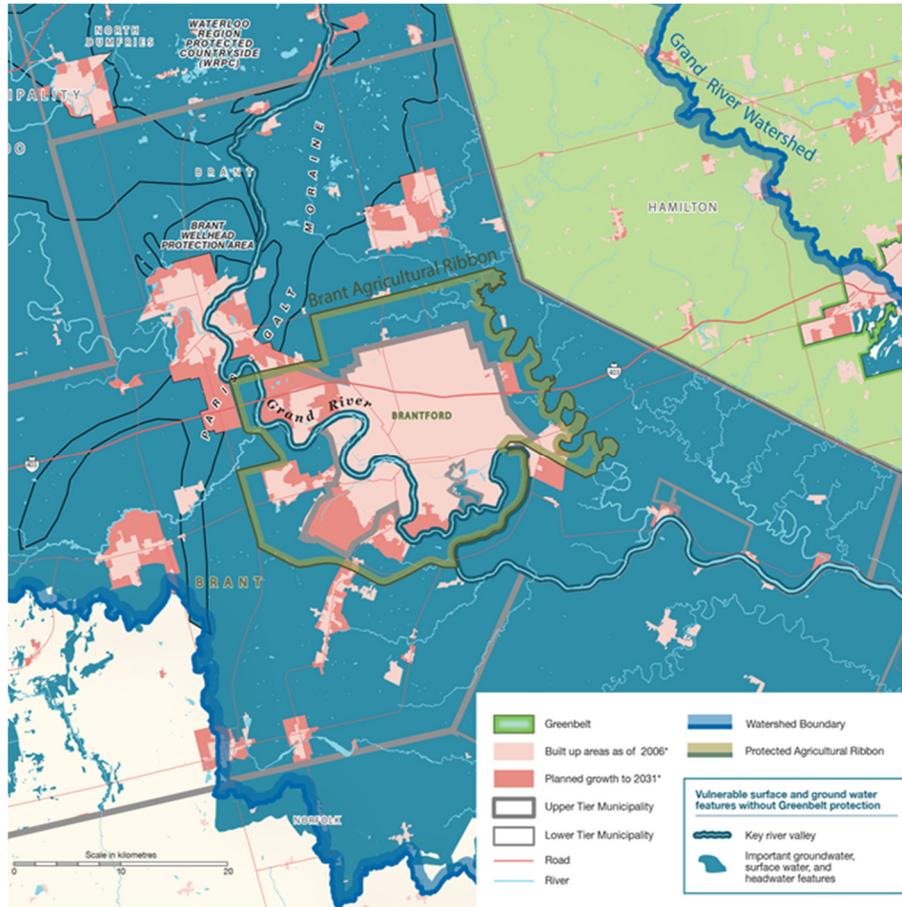
Figure 2



## B4. Brant County

The OHI supports the Bluebelt proposal, which includes the Grand River watershed in Brant County, an effort led locally by Sustainable Brant and that includes the land, natural heritage and water system that is contiguous with the Brant/Hamilton border of the Ontario Greenbelt.

As this area is high in headwater streams, prime agriculture, and current development activities, it is paramount that the Province move quickly on mapping and public consultation.

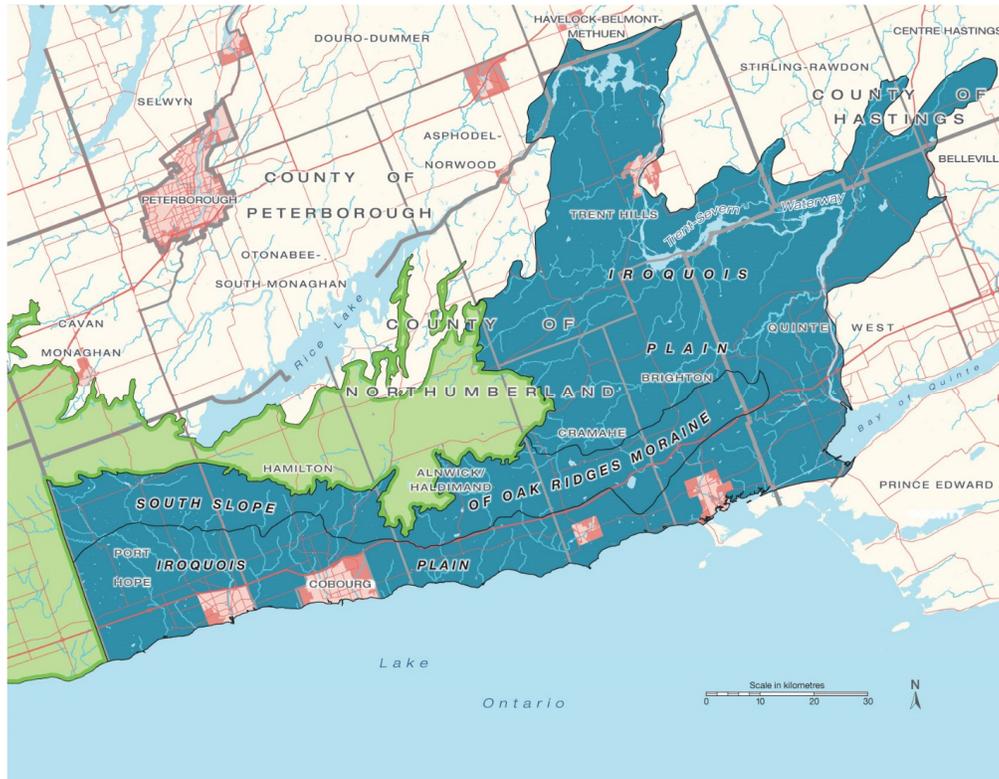


Source: [What's Proposed - Protect our Water \(protectourwaters.ca\)](http://protectourwaters.ca)

## B5. The Iroquois Plain

While part of the Bluebelt proposal, the OHI supports the inclusion of the Iroquois Plain in an expanded Greenbelt and which is of particular interest to STORM, the Nature Conservancy, and other local organizations.

As this area is high in headwater streams and current development activities, it is paramount that the Province move quickly on mapping and public consultation.



Source: [What's Proposed - Protect our Water \(protectourwaters.ca\)](http://protectourwaters.ca)