**Resources for**

**Provincial Grow the Greenbelt Consultation**

This information is provided to assist Ontarians wanting to prepare a submission to the Provincial “Consultation on growing the size of the Greenbelt”. We hope it helps you.

Please note:

* Here is the [Official Site](https://ero.ontario.ca/notice/019-3136) for the Government Consultation
* You must submit your comments by 11:59 pm on Monday, April 19, 2021.
* Any opinions, recommendations and other editorial content in this document do not necessarily represent the views of the contributors.
* We offer this information as a public service. We cannot guarantee its accuracy nor do we advise that it be used in any submission. **It’s up to you to decide how to use it.**

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**Key Resources:**

In 2017 over a 100 groups worked on a proposal to grow the Greenbelt to protect our precious water resources. Here are some key resources from this important effort:

* The [Bluebelt Map](https://d3n8a8pro7vhmx.cloudfront.net/growourgreenbelt/pages/57/attachments/original/1477684178/GrowOurGB-Bluebelt-Map-October2016.jpg?1477684178)
* [Growing the Green, Protecting the Blue Q&A](https://d3n8a8pro7vhmx.cloudfront.net/growourgreenbelt/pages/57/attachments/original/1465584842/GBT_GrowingtheGreenbelt_Q_A_E-ver.pdf?1465584842)
* [Growing the Greenbelt Primer](https://d3n8a8pro7vhmx.cloudfront.net/growourgreenbelt/pages/57/attachments/original/1466518343/1GBT_GrowingtheGreen_E-ver_UpdatedJune2016.pdf?1466518343)
* [Resource Page](https://www.growourgreenbelt.ca/bluebelt_resources) from growourgreenbelt.ca

**Sample Answers to Provincial Consultation Questions**

The Provincial consultation includes 6 questions to help guide people as they create a submission. Below is some content for sample answers.

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

- generally, the Province must be more ambitious in its approach to expanding the Greenbelt if it intends to protect precious farmland and natural areas from development and safeguard the countless benefits that they provide.

- support the inclusion of the Paris-Galt Moraine, but recommend that all other moraines in the GGH be considered as well: e.g., Orangeville Moraine; moraine between Waterloo and Elora/Fergus; Escarpment Area Moraines such as the Gibraltar and Singhampton Moraines; the Horseshoe Moraines that flank the Niagara Escarpment to the north near Clearview.

- as noted in ERO posting: moraines help “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. Moraines allow rain and snowmelt to soak into the ground more rapidly and in much greater amounts than the surrounding, less permeable areas. This process provides a reliable, slowly changing supply of water called baseflow to rivers and streams.”

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

- use a science-based approach to define the boundary so that it includes the area needed to protect all the headwaters and groundwater aquifers associated with the moraine and consequently ensures safe and abundant drinking water for dependent communities, sustains local ecosystems, and optimizes resilience to climate change impacts such as flooding and drought.

- The Province must meaningfully consult with Indigenous communities about expanding the Greenbelt within their traditional territories. The duty to consult is a constitutional obligation that arises from s.35 of the Constitution Act, 1982, which recognizes and affirms Indigenous and Treaty rights. Indigenous traditional practices, responsibilities and knowledge systems must be honoured by ensuring Indigenous voices are key to any discussions involving expanding the Greenbelt.

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

- support the inclusion of Urban River Valleys, but strongly recommend that private lands also be included in this designation. It is private lands within the Urban River Valleys that are threatened with urbanization and development, not public lands. As noted in the Environmental Registry posting, publicly owned lands “are often lands designated in municipal official plans as parks, open space, recreation, conservation and/or environmental protection.” So their designation under the Greenbelt does little if anything to “enhance the quality of the Greenbelt,” as the government intends. -Designate entire river valley corridors rather than only sections flowing through urban areas in order to adequately protect water resources.

-Consider the following for Urban River Valley designation: the Nith, Grand, Conestogo, Eramosa, Speed, Nottawasaga, Ganaraska, East Holland and Don Rivers, and Duffins, Carruthers, Twelve Mile, Gages and Cobourg Creeks.

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

- expansion of the Greenbelt should focus on protecting areas of high ecological and hydrological value that are under threat from urban development.

- include moraines (and other significant sand and gravel aquifer areas), coldwater streams, wetlands (and associated upstream tributaries) and headwaters

- also include former glacial lake Algonquin and Iroquois shorelines and plain and the entire Lake Simcoe Basin.

- add all moraines in the GGH to the Greenbelt (including Orangeville Moraine; moraine between Waterloo and Elora/Fergus; Escarpment Area moraines such as the Gibraltar and Singhampton Moraines; and the Horseshoe Moraines that flank the Niagara Escarpment to the north near Clearview):

- moraines store, cool and clean water, providing groundwater recharge and discharge<https://ontarionature.org/confessions/>

- Include coldwater streams and wetlands:

- coldwater streams improve water quality by cooling water in larger downstream rivers and provide important habitat for fish and wildlife (e.g., brook trout, endangered redside dace)<https://ontarionature.org/its-cool-to-be-cold-the-importance-of-coldwater-streams/>

- 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 (e.g. over 85% in GTA and Niagara)<https://ontarionature.org/on-world-wetlands-day-help-protect-ontarios-wetlands/>

- include headwaters:

- include the headwaters of south flowing stream systems within the inner ring of the GGH (the ‘Whitebelt’) where there are high development pressures (e.g., Humber, Don and Rouge Rivers and Duffins and Carruthers Creeks)

- Headwater areas play an extremely important role in the watershed, providing downstream benefits and functions such as improved water quality, storage and release and wildlife habitat<https://ontarionature.org/protect-whitebelt-headwaters/>

 -include 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.<https://ontarionature.org/greenbelt-eastern-expansion/>

- 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.

- 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.

- 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.

**Question 5: How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities (growth management, transportation, infrastructure, natural heritage, agriculture) mentioned above?**

- the protection of natural and water resource systems and farmland must take priority. 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.

- cancel plans to build Highway 413 (GTA West) and the Bradford Bypass (Holland Marsh Highway). These highways are expensive, not necessary and will permanently damage existing lands within the Greenbelt while also generating significant pressure by developers and municipalities to allow development along them (<https://environmentaldefence.ca/stop-the-413/> ). There are many other options available to manage the transportation needs of Ontarians that do not require sacrificing vital farmland, natural spaces and water resources.

- Housing needs of communities in the GGH can be met within lands already designated for development. In all municipal regions except Toronto and Peel growth has been less than projected and there are existing large surpluses of land available for development. The Neptis Foundation estimated in 2017 that the total supply of unbuilt land to accommodate housing and employment to 2031 and beyond across the GGH is 125,560 hectares. Instead of developing in the sensitive farmland and natural areas, we can and should build complete communities (gentle density, people friendly, walkable, jobs close by, climate resilient) inside the boundaries of our existing towns and cities. Brownfields close to existing infrastructure should be the priority for siting for commercial and industrial development.

-refrain from using Minister’s Zoning Orders (MZOs) to fast-track development on natural areas and farmland. [Conservation and agricultural organizations](https://view.publitas.com/on-nature/joint-letter-mzos-3-21/page/1) are united in their opposition to this misuse of MZOs which sidestep community consultation and local planning processes. At risk are the many benefits provided by Ontario’s farmland and natural heritage features and areas, including flood control, local food, water purification, carbon sequestration, biodiversity conservation, recreational opportunities and more.

-Allow municipalities to establish policies that go beyond the minimum standard set by the Greenbelt Plan. Policies that provide the highest level of protection for natural and hydrological features and farmland should prevail. We note with great concern, for example, that municipalities within the Greenbelt are not able to establish policies that are more restrictive on mineral aggregate extraction than those in the Greenbelt Plan even though, outside the Greenbelt, other GGH municipalities are able to establish policies that may be more restrictive on mineral aggregate extraction than the Growth Plan’s policies. This is an odd and perturbing situation where municipalities are not allowed to go above and beyond Greenbelt policies to protect precious water resources. It creates a true conundrum for municipalities where more restrictive policies are deemed necessary to protect water quality and quantity: inclusion in the Greenbelt expansion would prohibit them from doing so. A case in point is Waterloo Region, a municipality with strong water resource protection policies that are more restrictive with respect to aggregates extraction than Greenbelt Plan policies. The region relies almost exclusively on groundwater for its drinking water supply, a critical consideration from a public health and safety perspective. It is unreasonable to expect Waterloo Region to sacrifice these higher local standards. Mineral aggregate extraction policies should default to the policy offering the highest level of protection for water resources, including municipal policies. Until this policy is revised, more restrictive municipal mineral aggregate extraction policies than those in the Greenbelt Plan should be grandfathered for municipalities that are part of the Greenbelt expansion, recognizing that the policies in the Provincial Policy Statement, the Growth Plan and the Greenbelt Plan generally represent minimum standards which decision-makers are encouraged to exceed to address matters of local importance.

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

- meaningful consultation with affected Indigenous peoples: The government must proceed in a manner that honours and is informed by the responsibilities, rights, interests and Traditional Knowledge of Indigenous communities. Exploring options to expand the Greenbelt presents a potential opportunity to advance reconciliation among the peoples who share this land.

 - climate resilience: Protecting natural and hydrologic systems from development is a recognized “nature-based solution” 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 (<https://files.ontario.ca/mnrf-english-ontario-special-advisor-on-flooding-report-2019-11-25.pdf> ). 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 Canadadocumenting the “cost-effective” ability of wetlands to reduce flood damages and associated costs. (<http://assets.ibc.ca/Documents/Resources/IBC-Natural-Infrastructure-Report-2018.pdf> )

- health and well-being: Greenbelt expansion will provide many health benefits, including clean air and water and safe, local food. In addition, it presents an opportunity to maintain green spaces near our towns and cities, providing access to nature for current and future generations. The COVID pandemic has heightened public awareness of the significant health benefits of access to nature. These benefits include increased physical activity, better cognitive functioning, improved immune system functioning, greater resilience to stress, more positive social interactions and generally increased happiness. In fact, nine in ten Canadians feel happier when connected to nature. <https://view.publitas.com/on-nature/greenway_health_and_ecosystem_infographics/page/1>

- advancing complementary provincial policies: Greenbelt expansion presents opportunities to advance the achievement of objectives outlined in the Lake Simcoe Protection Plan, Ontario’s Biodiversity Strategy, Ontario’s Wetland Conservation Strategy and Ontario’s Great Lakes Strategy. These objectives include enhancing water quality, retaining and restoring vegetative cover, protecting wetlands, conserving biodiversity, improving the status of species of conservation concern, and restoring watershed health and resilience.

The Provincial consultation includes 6 questions to help guide people as they create a submission. Below are some sample answers.

**Submissions Made by Others**

[**Ontario Headwaters Institute**](https://waterscape.ca/wp-content/uploads/PDF-Version-of-Submission-of-March-31-with-App-A.pdf)

[**Ontario Farmland Trust**](https://ontariofarmlandtrust.ca/wp-content/uploads/2020/12/OntarioFarmlandTrust_ERO-019-3136.pdf)

[**Reimagine Peterborough**](https://docs.google.com/document/d/1aT2-sQCzNsQfoHaR4KtWD_rwsF3js1KuT9TROYSTeDo/edit?usp=sharing)