

Dated: April 19, 2021

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

Dear Minister Clark,

**Re: Comments for Consultation on Growing the Size of the Greenbelt, ERO #019-3136  
Submitted by: The Halton Environmental Network (HEN)**

Comments are provided to support The Ontario Provincial Government's protection of the Greenbelt from development for future generations recognizing, "The Greenbelt is home to much of Ontario's vital environmental, groundwater and agricultural resources." In the government's 2020 Budget, a pledge was made to expand the size of the Greenbelt.

HEN supports expanding and enhancing the quality of the Greenbelt through incorporating additional lands and further protecting critical and essential natural heritage systems and functions in Urban River Valleys and moraine areas as key examples. Areas for expansion and enhancement should be maximally inclusive to protect surface and subsurface lands with ecological and hydrological functions, with natural heritage features including corridor linkages, lands that are culturally significant and also protect lands vital to local food production and sources of drinking water. Meaningful consultation with Indigenous Peoples must be integrated into decision-making on growing the Greenbelt.

The ERO presented six questions to frame responses to this proposal.

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

Bill 71, the Paris Galt Moraine Conservation Act, 2019 that would establish a Paris Galt Moraine Conservation Plan is supported and endorsed. It is important to move this Act forward expeditiously and then develop and implement a comprehensive plan to ensure the Act's objectives are met.

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

In establishing a boundary for the Paris Galt Moraine area it is critical that a science-based focus be applied to ensure that an integrated systems approach is used to determine the maximum extent of the area's surface and subsurface ecological and hydrologic function. This determination also requires details on the surface and subsurface ecological and hydrological features linked to proposed Greenbelt expansion areas that may involve protecting and enhancing important connectivity corridors (surface and subsurface). Consideration of the current impacts on hydrologic function relating to existing water extraction for both commercial

and municipal uses, and the impact on hydrologic function under projected future needs scenarios needs detailed consideration. Opportunities for enhancement and maximum protection for the ecological and hydrologic services provided within the Paris Galt Moraine should be considered when moving to establish a defined boundary. Involving Indigenous Peoples is critically important and must be integrated early into meaningful consultations.

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

It is important to understand the relationship of the Urban River Valleys as a framework but not the entire representation of areas needing inclusion, enhancement and expansion. These urban areas should be expanded to establish continuous ecological and hydrological connection to other areas with important ecological and hydrologic functions such as the Paris Galt Moraine area and rural stream, creek and river valley areas as examples using an integrated systems approach. This approach would support whole system integrity and sustainability into the future.

River valleys provide a framework to support resiliency within natural systems. Ecological and hydrologic services include but are not limited to, biodiversification, stormwater and flooding management, water quality improvement, erosion and sediment control, buffering between uses and much more. Opportunities to restore and enhance ecological and hydrologic function exist through nature-based restoration approaches. An important data layer would be to establish a natural asset inventory for all areas within the Greenbelt, expansion areas and Urban River Valleys also including expansion areas with linkages to other key natural heritage systems/areas but not limited to those noted above.

These areas should be expanded into private lands in the urban area as currently there are gaps between publicly held lands that leave these lands vulnerable to modifications and degradation by private owners that have and can impact system integrity and function. This is particularly important in vulnerable riparian buffer areas that need protection, restoration and enhancement. A mechanism for funding is already present for agricultural lands as well as funding for agricultural fencing programs in some watersheds. It would be supportive if funding was available for other rural, urban, private and agricultural lands with ecological and hydrologic function.

The integration of natural areas beyond the Urban River Valley areas, across the Greenbelt and to other natural heritage systems and key features should not create duplication but rather work within the greater systems approach for watersheds and river valleys.

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

There is agreement with the comments submitted by Halton Region with highlights: To prevent continued urbanization pressures beyond urban boundaries these boundaries should be hardened to provide clear delineation and best use of infrastructure and land resources in already urbanized areas. Greenbelt, natural heritage, wetlands, urban river valleys and other key ecosystem features across the Greater Golden Horseshoe are lands that need to be protected as functioning natural assets providing valuable and cost effective ecological and

hydrologic services and resilience to climate change. Agricultural lands are critically important and represent more than the land-based value in terms of supporting a locally sustainable food supply, the Ontario economy as well as services and functions within the natural asset systems. Inclusion of prime agricultural land within the Greenbelt provides another mechanism of protection. The protection of agricultural lands supports local resiliency and food security in times of climate change, and challenges and uncertainty as seen in this pandemic. When prime agricultural lands and their services and functions are lost to urban development, impacts are and will be permanent and irrecoverable. Other areas for expansion of the Greenbelt are noted in previous answers.

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

Expansion of Greenbelt will provide critical underpinning of Ontario's long term sustainability of agricultural and natural heritage lands that provide valuable and cost-effective ecological and hydrologic services and resilience to climate change impacts. To grow the Greenbelt and protect, restore and enhance the essential services provided within the Greenbelt and expansion areas, it will be essential to minimize intrusion of growth, infrastructure, transportation and other land uses that impact these essential services and functions.

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

A maximally expanded Greenbelt will: ensure Ontario is more resilient to climate change; optimize the valuable and cost-effective ecological and hydrologic services; protect and enhance biodiversity; and, support the health and wellness of Ontarians through accessible greenspace adjacencies.

Other concerns include the potential of Ministerial Zoning Orders within Greenbelt areas and their permissive nature along with the permissiveness associated with aggregate uses without comprehensive assessment of impact on hydrologic services and ecological function.

This proposal with maximal application can go far in representing an integrated systems approach to protect, restore and enhance Ontario's natural assets. These natural heritage systems, key features, agricultural lands and more, are valued by Ontarians and will continue to grow in critical importance in a future where Ontario's health and prosperity will depend on the resiliency of our natural systems.

Thank you for the opportunity to comment on the Province's proposal to grow the Greenbelt. HEN would be available to provide additional detail to support these comments.

Best Regards,  
Lisa Kohler, HEN Executive Director  
Cindy Toth, HEN Board Vice Chair