

April 22, 2022

BY E-MAIL ONLY (greenbeltconsultation@ontario.ca)

Greenbelt Consultation
Provincial Planning Policy Branch
777 Bay Street, 13th floor
Toronto, ON M7A 2J3

Re: Proposed Amendments to the Greenbelt Plan (ERO #019-4485) and Area Boundary Regulation (EROs #019-4483) and Ideas for Adding More Urban River Valleys (ERO #019-4803)

Thank you for the opportunity to comment on the above noted Environmental Registry (ERO) postings. TRCA conducts itself in accordance with the objects, powers, roles, and responsibilities set out for conservation authorities (CA) under the *Conservation Authorities Act* (CA Act) and the Ministry of Natural Resources and Forestry's Procedural Manual chapter on CA policies and procedures for plan review and permitting activities. TRCA is:

- A public body under the *Planning Act* and *Environmental Assessment Act*;
- An agency delegated the responsibility to represent the provincial interest on natural hazards under Section 3.1 of the Provincial Policy Statement (PPS);
- A regulatory authority under Section 28 of the CA Act;
- A service provider to municipal partners and other public agencies;
- A Source Protection Authority under the *Clean Water Act*;
- A resource management agency; and
- A major landowner in the Greater Toronto Area.

In these roles, and as stated in the "A Made-In-Ontario Environment Plan," TRCA works in collaboration with municipalities and stakeholders to protect people and property from flooding and other natural hazards, and to conserve natural resources. Through Memorandums of Understanding and Service Level Agreements, TRCA provides technical support to its provincial and municipal partners in implementing municipal growth management policies. TRCA provides science-based policy advice to municipalities related to planning and environmental assessment applications in the Provincial Greenbelt to achieve land use and infrastructure planning decisions that conform to the Greenbelt Plan. The Plan's Urban River Valley designation confers a provincial interest on urban river valleys already protected through municipal official plan policies and TRCA's Regulation and policies.

Government Proposal

Through the subject EROs, the Ministry of Municipal Affairs and Housing is undertaking Phase 2 consultation to grow the Greenbelt. In doing so, we understand that the Ministry intends to build upon previous feedback through Phase 1 of this consultation and seek additional input on proposed amendments to the Greenbelt Plan (including Schedules 1, 2, and 4) and Greenbelt Area Boundary Regulation (Ontario Regulation 59/09) that would add thirteen new Urban River Valley (URV) areas to the Greenbelt Plan.

Additionally, we understand that general feedback for other potential new URV additions or expansions to the Greenbelt is also being sought, provided such recommendations reflect the "Key Principles for Expanding the Greenbelt" identified in Phase 1.

Attachment 11: TRCA Submission on ERO_019-4483, ERO_019-4803, ERO_019-4485

We note that, of the thirteen new URVs proposed, five are located within TRCA's jurisdiction along the Don and Humber River valley corridors within the limits of the City of Toronto. Specifically, the proposals would include portions of the following watercourses:

Don River

- Burke Brooke
- Wilket Creek
- Taylor Massey Creek

Humber River

- Humber Creek
- Black Creek

Comments

TRCA offers the following comments, which are reflective of those previously provided to the Ministry through Phase 1 consultation on Growing the size of the Greenbelt on April 19, 2021 (ERO# 019-3136).

TRCA supports increasing the size of the Greenbelt through new or expanded URVs, especially from an educational and awareness-raising standpoint. As stated in the Greenbelt Plan, the river valleys that run through existing or approved urban areas and connect the Greenbelt to inland lakes and the Great Lakes are a key component of the long-term health of the Natural System.

As per policy 6.2.1 of the Greenbelt Plan, Greenbelt policies related to URVs only apply to public lands. By virtue of this policy application and the new URVs being predominantly on public lands, the new URVs are already protected through other policy and regulatory means. In addition to being protected by existing provincial policies that address natural heritage and hydrologic features and areas (i.e., PPS, Growth Plan, Source Protection Plans) and CA policies and associated regulations, URV lands are typically already designated for protection in official plans (OPs) as parks, open space, recreation, conservation and/or environmental protection.

TRCA has been collaborating with our municipal partners to provide updated science-based Natural Heritage System (NHS) mapping to inform municipal OP updates through the Municipal Comprehensive Review (MCR) process. TRCA has also developed Water Resource System (WRS) data layers to help our municipal partners conform to new provincial policies requiring identification of the WRS. These scientific and systems-based areas (or portions thereof) would more effectively inform future Greenbelt expansions once the NHS and WRS frameworks are in place and related components of MCR work conclude.

TRCA would welcome the opportunity to help delineate and/or refine the most appropriate boundary expansions based on science and in consultation with affected municipalities. However, until MCRs are complete in accordance with the upcoming July 1, 2022 conformity deadline imposed through the Growth Plan, the implications of Greenbelt expansion on other provincial priorities cannot be fully understood, particularly in relation to updated NHS and WRS mapping, Land Needs Assessments, long-term infrastructure planning and the implementation of the Province's Agricultural System.

Notwithstanding the above, TRCA has identified areas we believe generally align with the Province's criteria for URV expansion and would be in keeping with the Greenbelt Plan's objectives, vision and goals while further enhancing the quality and extent of existing protections. Examples of these areas include, but are not limited to:

- Major watercourses in our jurisdiction currently excluded from the Greenbelt but linked to existing Greenbelt areas, URVs with direct connections through the Plan's natural heritage, and water resource systems linked through Lake Ontario.
- Relatively small, isolated pockets, primarily consisting of prime agricultural land containing and/or adjacent to natural features fully encapsulated by (but outside) larger swaths of the Greenbelt, which if enveloped by the Greenbelt would form and further enhance a continuous broad band or protected land built upon the Greenbelt's systems approach.

Attachment 11: TRCA Submission on ERO_019-4483, ERO_019-4803, ERO_019-4485

- Provincially owned lands within the natural heritage system of current OPs that, if expanded, would link existing Greenbelt areas across watershed corridors as part of a larger, connected system.
- Stretches of former Lake-Iroquois shoreline between existing URVs, which represent largely east-west wildlife habitat movement corridors and areas of increased groundwater recharge and discharge functions.

With regard to the ERO's request for ideas to expand the Greenbelt, **TRCA recommends that the Province review the URV policies, with a focus to consider a natural systems-based approach to expanding and enhancing the Greenbelt rather than a private versus public land ownership criteria.** This would better reflect the Province's key factors of Greenbelt expansion and enhancement, as listed in the ERO posting, (i.e., to allow for the ecological connection and integration of the Greenbelt into urban settings through river valley connections, and to protect natural and open space lands to assist in ecological connections, natural heritage and hydrologic features and functions of river valleys).

TRCA's Living City Policies states that TRCA supports the legislated protection and management of the Greenbelt and continues to participate as a partner in coordinated programs to secure lands, provide stewardship, and advance the science and understanding of the Provincial Greenbelt lands through watershed, groundwater, and natural heritage studies and monitoring. Accordingly, **should the Province not consider the above recommendation, TRCA recommends that the Province consider proposing and consulting on a mechanism for newly acquired public lands, that meet provincial criteria for Greenbelt/URV expansion, to be added to the Greenbelt.**

Thank you once again for the opportunity to provide comments on this proposal. Should you have any questions, require clarification on any of the above, or wish to meet to discuss our remarks, please contact the undersigned at 416.661.6600, Ext. 5281 or at laurie.nelson@trca.ca.

Sincerely,

<Original signed by>

Laurie Nelson, MCIP, RPP
Director, Policy Planning

BY E-MAIL

cc:

TRCA: John MacKenzie, Chief Executive Officer
Sameer Dhalla, Director, Development and Engineering Services
Alexander Schuler, Associate Director, Property, Assets and Risk Management