

# Attachment 6: TRCA Submission on ERO#019-3136

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Greenbelt Consultation  
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**BY E-MAIL ONLY** ([greenbeltconsultation@ontario.ca](mailto:greenbeltconsultation@ontario.ca))

## **RE: CONSULTATION ON GROWING THE SIZE OF THE GREENBELT (ERO #019-3136)**

Thank you for the opportunity to comment on the Ministry of Municipal Affairs and Housing's (MMAH) Environmental Registry of Ontario (ERO) posting consulting on ways to grow the size and further enhance the quality of the Greenbelt.

TRCA conducts itself in accordance with the objects, powers, roles, and responsibilities set out for conservation authorities (CAs) under the *Conservation Authorities Act* (CA Act) and MNRF Procedural Manual chapter on CA policies and procedures for plan review and permitting. TRCA is:

- A public commenting 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. Further, TRCA recognizes the importance of efficiency, certainty, transparency and accountability in planning and design review processes, so that development and infrastructure projects can occur in a timely and environmentally sustainable manner.

## **GOVERNMENT PROPOSAL**

We understand that the government is consulting on expanding the size of and enhancing the Greenbelt, with the following identified as priorities:

- Lands in and around the Paris Galt Moraine
- Ideas for adding, expanding, and further protecting the region's Urban River Valleys (URVs)

# Attachment 6: TRCA Submission on ERO#019-3136

Regarding potential Greenbelt expansions, the following principles are articulated, although the ERO is soliciting input regarding “other potential areas to grow the Greenbelt as well as other priorities”.

- **No consideration of removal requests or land exchanges**
- **No consideration of policy changes** (existing protections will not be reduced).
- **Supports Greenbelt Plan objectives, vision, and goals** (protects agricultural land base and ecological and hydrological features, areas, and functions; only publicly owned lands in URVs).
- **Follows Existing Amendment Process** (as per *Greenbelt Act, 2005*)
- **Connects physically and/or functionally to the current Greenbelt** (continuous broad band of protected land built upon the Greenbelt’s systems approach, with direct connections throughout the Plan’s natural heritage, water resource or agricultural systems; no unconnected islands of Greenbelt land).
- **Considers impacts on existing provincial priorities** (e.g., as outlined in PPS, Growth Plan).

## DISCUSSION QUESTIONS

TRCA provides the following comments in response to the discussion questions posted through this ERO. Key comments are in **bold** text.

1. *What are your thoughts on the initial focus area of the Study Area of the Paris Galt Moraine?*
2. *What are the considerations in moving from a Study Area to a more defined boundary of the Paris Galt Moraine?*

The Paris Galt Moraine provides essential hydrological and ecological functions similar to the Oak Ridges Moraine, including functioning as a groundwater recharge zone that sustains a vital supply of drinking water for residents and a groundwater storage and discharge area that supports cold water headwater stream habitat. However, it is outside of TRCA’s jurisdiction and as such, we defer to the local CAs, in partnership with affected municipalities.

3. *What are your thoughts on the initial focus area of adding, expanding and further protecting URVs?*

While TRCA generally supports the Province’s intent to grow URVs, especially from an educational and awareness-raising standpoint, current Greenbelt policies related to URVs only apply to public lands. By virtue of being exclusively on publicly owned lands, URVs are largely protected through other policy 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. Subsequently, any expansion of the URVs to include public lands would not necessarily result in additional land being better protected from future development impacts. **Although outside the purview of this consultation, TRCA notes that a provincial review of the current URV policies could help better achieve the Province’s objective of expanding and enhancing the Greenbelt.**

Further to the above, we note that adding/expanding URVs at this time may not capture the outcomes of any refinements to existing URV boundaries being undertaken through ongoing Municipal Comprehensive Reviews (MCRs) to ensure all publicly owned lands are included, and any lands that may have been acquired since URVs were added to the Greenbelt. Moreover, we note that this consultation may not capture future lands transferred into public ownership (including those acquired by CAs) containing contributing natural features that would otherwise enhance Greenbelt policy intent. We therefore

## Attachment 6: TRCA Submission on ERO#019-3136

continue to support the provisions of Section 5.6.1 of the Greenbelt Plan that would allow future lands acquired/dedicated into public ownership which meet provincial criteria for Greenbelt/URV expansion, (e.g., working with conservation authorities and requests from municipalities).

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

**TRCA has identified areas we believe generally align with the Province's criteria for expansion and would be in keeping with the 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 of protected land built upon the Greenbelt's systems approach and is supported by science.
- 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.

**Although specific locations and additional details for these examples can be provided, we recognize that advocating for their inclusion into the Greenbelt may be premature in light of ongoing MCRs and without substantive consultation with our municipal partners regarding any such expansions.** Should expansions within our jurisdiction be proposed, (ideally after the MCR conformity deadline), TRCA would welcome the opportunity to help delineate the most appropriate boundary expansions based on science and in consultation with affected municipalities.

As elaborated on in our response to Question 5, 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 MCR process. TRCA has also been developing 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 concludes. TRCA would be pleased to meet with the Province to discuss our approach to developing these layers.

5. *How should the Province balance or prioritize any potential Greenbelt expansion with the other provincial priorities (Growth Management, Natural Heritage and Water Resource Systems, Agriculture, Infrastructure)?*

**Greenbelt expansions should be informed by science and considered in the context of ongoing MCRs.** TRCA commends the Province for exploring opportunities to expand and enhance the Greenbelt. However, until MCRs are complete, the implications of Greenbelt expansion on other provincial priorities (as acknowledged by the province through this ERO) cannot be fully understood, particularly in relation to updated NHS and WRS mapping, Land Needs Assessment (LNA), long-term infrastructure planning and the implementation of the Agricultural System.

## Attachment 6: TRCA Submission on ERO#019-3136

Using our science-based approach, TRCA has been working diligently with our partner upper, single- and lower-tier municipalities to identify key issues related to our watersheds and the natural environment through our involvement in their MCR conformity and OP review work. To date, we have shared reporting that consolidates watershed studies, their findings, and key current and future challenges facing our watersheds and provided recommended policy updates to inform land use, source water protection, land needs and infrastructure planning, as well as broader input to guide future collaborative work between municipalities and CAs.

As per our response to Question 4, TRCA has been developing updated WRS and NHS mapping which we are actively sharing with our municipal partners to inform refinements to their local systems. For example, updated information includes existing and potential (i.e., restoration areas) natural cover while building in new information, including both terrestrial and aquatic habitat needs for a single integrated system. It also considers climate vulnerability for both terrestrial and aquatic species, ecological connectivity, and other new science. Of note, a new additional data layer includes areas that contribute to ecosystem function that may be within the built environment. In these areas, additional measures, such as low impact development or urban tree canopy would help improve ecosystem resilience based on a contributing function.

### *6. Are there other priorities that should be considered?*

Protection beyond URVs - The current consultation provides the opportunity to explore other potential areas to grow and enhance the Greenbelt. In this context and considering Section 3.2.6.3 (External Connections) of the Greenbelt Plan, we note the potential to expand wildlife movement protection and enhancement along regional corridors, as recommended by the Central Lake Ontario CA (CLOCA). **Based on CLOCA's scientific rationale, TRCA notes that east-west stretches of the shoreline between URVs within TRCA's jurisdiction could also be added to included within the URV designation to reinforce the ecological importance of publicly owned lands on this landscape.**

Climate Change – The PPS was recently updated to include enhanced policy direction to prepare for the impacts of a changing climate. **Growing the Greenbelt will assist the Province with achieving some of its objectives related to climate change, a consideration which should be acknowledged in the context of other provincial priorities pertaining to growth management.** TRCA is currently working with our municipal partners (e.g., Durham Region) to bring some of the latest climate science forward in identifying natural heritage climate change vulnerabilities. This information could inform how to build a more robust and climate-resilient municipal NHS through the MCR process, which could influence Greenbelt expansion and enhancement considerations.

Thank you once again for the opportunity to provide comments on the government's consultation on growing the size of the Greenbelt. 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 416.667.6290 or at [john.mackenzie@trca.ca](mailto:john.mackenzie@trca.ca).

Sincerely,

<Original Signed by>

John MacKenzie, M.Sc.(PI) MCIP, RPP  
Chief Executive Officer

### BY E-MAIL

cc TRCA: Laurie Nelson, Director, Policy Planning  
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