

April 19, 2021

Submitted by email: greenbeltconsultation@ontario.ca

Minister Steve Clark and
the Environmental Registry of Ontario
Ministry of Municipal Affairs and Housing

Re: ERO 019-3136 Response to Request for Comments: Growing the Size of the Greenbelt

Green Durham Association (GDA), a not for profit charitable organization, has for many years worked closely with partners such as municipalities, private landowners and conservation authorities to add to conservation land holdings, protected land, creation of trail and natural heritage linkages connecting conservation lands and communities, and the stewardship of these lands. GDA is dedicated to protecting the forests, farmlands and natural areas which lie northeast of Toronto in Uxbridge, North Pickering and adjacent Greenbelt lands.

We participated in consultations related to development of the Greenbelt, and of the Oak Ridges Moraine Conservation Plan and Act. We have contributed submissions to the Provincial Plan review process throughout the years which recommend changes to the *Provincial Growth, Greenbelt and Moraine Plans* aimed among other things supporting expanded availability of trails. GDA members have worked closely with conservation authorities, municipalities and other partners in the development of an overall conservation and trail plan, primarily to support key land acquisitions but also to better maintain existing conservation land and trail systems.

We applaud the government's proposal to expand the Greenbelt. The science and understanding of the importance of protecting watersheds and natural heritage features has evolved since the Greenbelt was first proposed and formalized. Evidence supporting the link between human health and access and proximity to nature has also grown substantially. We are pleased to see this government's leadership in a proposal to expand Greenbelt boundaries. As mentioned our interest is in a particular geographical area and our comments below reflect this.

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.

We understand 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.

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.

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

Urban River Valleys are in an ideal position to support the populations living in the Greater Golden Horseshoe. We support the addition of these URV to be included in the Greenbelt. Urban river valleys are specific features that make Southern Ontario cities more liveable. Beyond their hydrological and ecological functions, they serve multiple roles - they are at the same time urban lungs, wildlife corridors, recreational parks and trails, and cultural assets. During the current pandemic, they have contributed to the wellness and relief of stress of nearby residents who have flocked to trails obtain the benefit of fresh air and the outdoors. Natural disasters of the past, such as Hurricane Hazel in 1954, and recent extreme changes in weather, have demonstrated the importance of protecting their boundaries from urban encroachment. Protecting the headwaters of these Urban River Valleys is also important.

In addition to the watersheds outlined on the "Bluebelt" map developed by Ontario Nature ¹ (<https://ontarionature.good.do/bluebelt/sign/>) we would like to see the following tributaries explicitly included:

- Mitchell Creek (west of Claremont)
- Reesor Creek (north of Seaton)

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

We encourage the Province to strengthen its commitment to protect the Duffins Rouge Agricultural Preserve. This is part of the Greenbelt but there has been ongoing pressure to urbanize these lands.

The Seaton lands abutting the Duffins Rouge Agricultural Preserve are not currently part of the Greenbelt and we would like to see them added to any expansion of the Greenbelt. GDA has participated in a long dialogue over many years with the Province on the 3,000 – 4,000 acres of provincial land within Seaton that is slated for conservation and includes the Seaton Trail and other community trails.

Duffins Creek is vulnerable above and below Highway 7 at Green River and south to Whitevale. Extending the Greenbelt boundary east would further protect the overall health of the watershed. These suggested areas are largely comprised of provincial lands that are now regionally or municipally controlled, or for sale through Infrastructure Ontario.

At Whitevale, there is a naturalized parcel and wetland, formerly a gravel pit, contiguous with the Duffins Creek natural heritage system. Local residents with a deep awareness of the area, highlight that the Whitevale Marsh should never have been designated for development, advocating for its long-term protection as parkland. To the best of our knowledge, the parcel is still owned by Infrastructure Ontario and therefore could be considered "public lands" and eligible for inclusion in the Greenbelt.

In Green River, Durham Region is planning an ill-suited transit and waste depot to service the Pickering 'Innovation Corridor'. This proposed project is on the immediate east side of Duffins Creek as the river flows under Highway 7. The industrial site is both a risk to the watershed and also unsuitable for the residential neighbourhood and heritage hamlet. By extending the Greenbelt boundary to the east side of the river, it would add a much-needed buffer to the pristine stream system, be a local extension of Pickering's District Park to the immediate north, and also make possible a future expansion of the Seaton Trail recreation network up to Rouge National Urban Park (the current plan shows pedestrian connectivity with RNUP by travelling along the very busy Highway 7 corridor). These public lands, currently held for economic development along Highway 7, are much more suitable for Greenbelt than industrial development.

The headwaters of Carruthers Creek and the surrounding lands currently designated as Whitebelt lands are not in public hands but are valuable farmland. These lands are adjacent to the existing Greenbelt and have been under development pressure in recent years. These lands are part of the Agricultural System which has been mapped and which we hope will be adopted as part of the Greenbelt expansion.

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

Agriculture – We support the excellent submission made by the Ontario Farmland Trust to grow the Greenbelt across the GGH Agricultural system.¹ We suggest that the Agricultural System that has been identified and mapped in the GGH be included in the expansion of the Greenbelt in its entirety. The Agricultural System that has been mapped in the GGH contains some of the most at-risk farmland in the province, which would benefit from the additional protections of the Greenbelt.

Infrastructure – 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.

¹ https://ontariofarmlandtrust.ca/wp-content/uploads/2020/12/OntarioFarmlandTrust_ERO-019-3136.pdf

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

Over the years our work has focused on certain federally and provincially-held lands in north Pickering and Uxbridge municipalities. While these lands are not a focus of this current Greenbelt initiative, it is worth mentioning in the spirit of the Grow the Greenbelt initiative. Our work has focused on connecting these greenlands to communities where people live and work, to support an enjoyment of nature and the out of doors close to these communities. The current pandemic has highlighted the importance of our efforts. There are two projects we would like to mention at this time:

- In the case of the federally held lands, we would like to connect communities to what is now the Rouge National Urban Park (RNUP), and do so in a manner which does not pre-empt the possibility of an airport as an option. An attached map (Appendix A) on the following page shows two possible connections we have been working on with the federal government: one connection is near the development of Seaton, which would permit a nature corridor along a river to the RNUP. The other is near the town of Clarendon. Both are indicated on the attached map as “A” and “B” and are outlined in yellow.
- The second is a project we have been working on ever since an earlier government created the Oak Ridges Moraine Act. Lands in Uxbridge Township owned by a developer were swapped for lands in Seaton in order to settle a potential dispute at that time. The lands have been held by the Province (Infrastructure Ontario) ever since. We would like to see these lands transferred to an entity such as a conservation authority or municipality and developed as a public park. These land holdings are already situated on the Greenbelt. They provide a connection between the Town of Uxbridge and a significant trail network to the south. A map (Appendix B) on a following page shows Transfer of ownership and development of a trail network on these lands would be of significant benefit to a growing population in nearby communities of Stouffville, Markham, Pickering, Whitby and beyond. They could also provide economic and tourism development opportunities for the Town of Uxbridge.

As mentioned, we recognize that both of these situations are not a focus of the Grow the Greenbelt initiative but they do fit with its intent, which we applaud. Provincial leadership would be helpful to work through the bureaucracy which to date has handicapped the transfer of these lands.

Thank you for the opportunity to comment on the Grow the Greenbelt. This is a once-in-a-generation effort for which the government is to be commended.

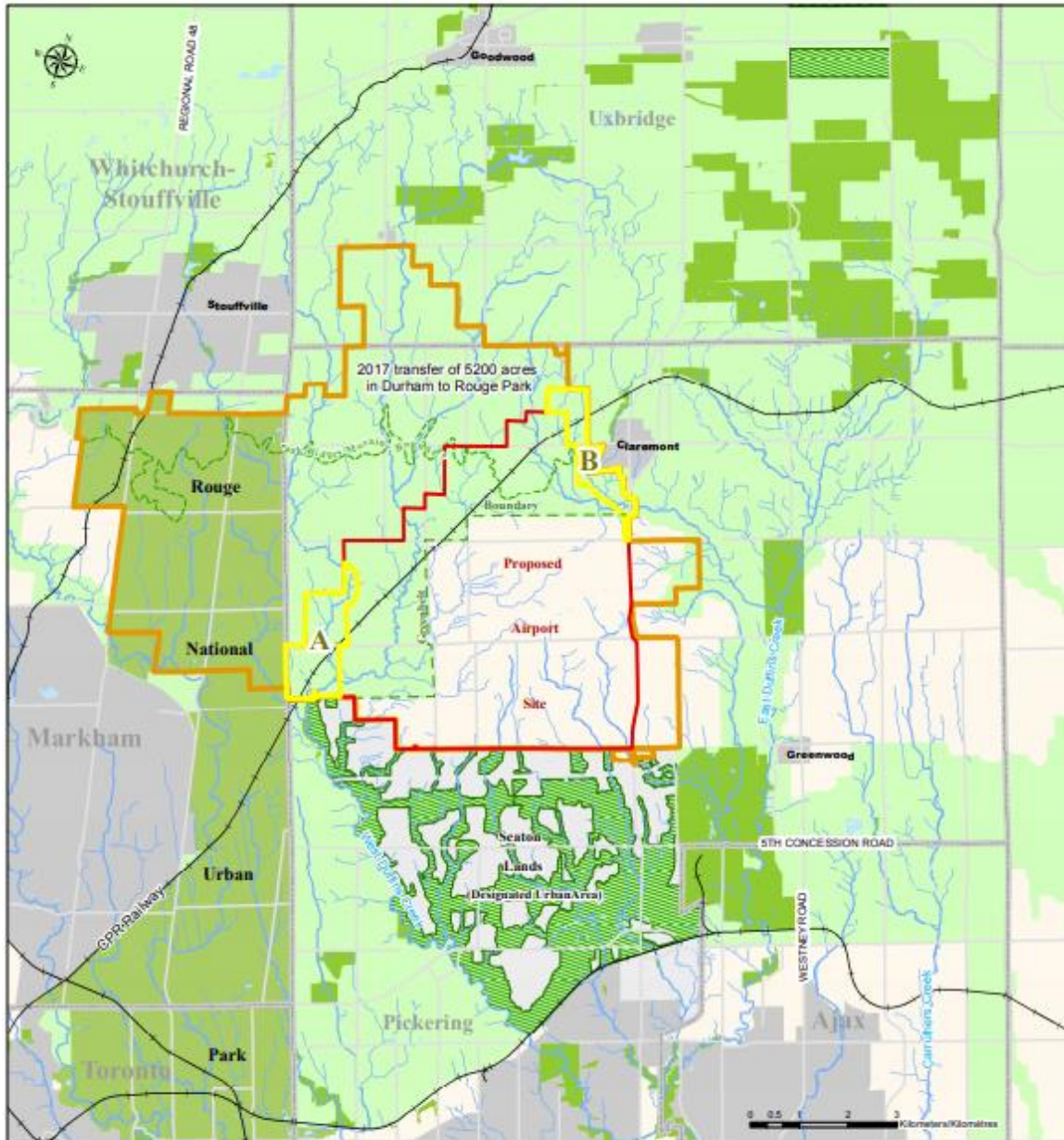
Yours truly,



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APPENDIX A



<p>Legend</p> <ul style="list-style-type: none"> Federal Lands Provincial Lands TRCA and Other Conservation Lands in Pickering and Uxbridge Urban Areas Greenbelt/Oak Ridges Moraine Railway 	<p>Légende</p> <ul style="list-style-type: none"> Biens fonciers fédéraux Biens fonciers de la province Toronto and Region Conservation Authority (TRCA) et autres aires de conservation à Pickering et Uxbridge Régions urbaines Ceinture de verdure/ La moraine d'Oak Ridges Voie ferrée 	<p>Disclaimer:</p> <p>The Data used to create this map was compiled from a variety of sources & dates. The T.R.C.A. takes no responsibility for errors or omissions in the data and retains the right to make changes & corrections at anytime without notice. For further information about the data on this map, please contact the T.R.C.A. GIS Department. (416) 661-6600. © Parks Canada Agency May not be reproduced without permission. February 2, 2017</p>	<p>Avertissement:</p> <p>Les données utilisées pour la création de cette carte proviennent de nombreuses sources et de dates variées. TRCA n'accepte aucune responsabilité pour quelques erreurs que ce soit ou omission de certaines données sur cette carte. TRCA conserve le droit de modifier ou faire des corrections à cette carte en tout temps, sans préavis. Pour de plus amples renseignements au sujet des informations sur cette carte, prière de vous adresser à TRCA au (416) 661-6600. © L'Agence Parcs Canada Cette carte ne peut être reproduite sans permission. Février 2, 2017</p>
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Appendix B

