



March 1st, 2018

Ministry of Municipal Affairs
Provincial Planning Policy Branch
777 Bay Street, 13th Floor
Toronto, ON
M5G 2E5

RE: EBR Registry 013-1661 for input on a study area for potential Greenbelt expansion to protect water resources in the outer ring of the Greater Golden Horseshoe (GGH):

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated agricultural, natural, and cultural features of the countryside. OFT achieves this through direct land securement, stewardship, policy research and education to benefit all Ontarians.

Thank you for the opportunity to submit feedback on the study area for potential Greenbelt expansion to protect water resources in the outer ring of the GGH. OFT appreciates the Ministry's dedication to supporting water health and agricultural viability in Ontario. OFT has played an active stakeholder role in encouraging the balance between rapid urban growth and development pressure within the region while maintaining and preserving the GGH's water, natural heritage and agricultural features. OFT is pleased to continue to work with the Province in considering the proposed study area and in moving towards a formal Greenbelt expansion.

OFT applauds the Ministry's work in developing the proposed study area for potential Greenbelt expansion. The proposed study area not only aims to preserve water, but also agricultural areas within the GGH. The link between water health and agricultural health is important and OFT is pleased that the Ministry has addressed this link within the consultation. Farmers take water preservation seriously and farming contributes to the overall health of the Province's water resources. OFT believes this consultation is important to inform decisions on how to move from a study area to a proposed Greenbelt boundary.

The proposed study area offers promising protection for water resources in the outer ring of the GGH in addition to protecting agricultural lands. OFT has the following recommendations to strengthen the proposed study area and any future consultation on a proposed Greenbelt boundary. These recommendations fall under the following themes of interdependence, responsible growth, and study area rationale.



Interdependence between Water and Agriculture

- OFT recognizes the importance of protecting water features across the GGH and is pleased that farmland within the identified areas will also be preserved. Agriculture and agri-food sectors rely on yet also affect water resource, for example through vegetation and drainage patterns.
- There is a mutual interdependence between water and agriculture from a quality of life and economic perspective. OFT recognizes that agriculture itself is dependent on the availability and quality of water. Farmland provides a catchment area for rain allowing for natural infiltration renewing ground water supply and mitigating flooding. The viability of the GGH's water and agricultural resources is of paramount importance to sustain future population growth and our self-sufficiency. It is important for Greenbelt expansion to target additional agricultural areas specifically for protection in a meaningful way.
 - 1) **OFT recommends that the Province continues to address and strengthen the mutual interdependence between water and agriculture and that any formal Greenbelt expansion should consider farmland in addition to water features, including wetlands, cold water streams, and moraines, within the defined selection criteria.**
- OFT recognizes the divide between urban and rural populations and that protecting water is a top priority. Additional awareness and consideration of the mutual interdependence between agriculture, water quality and quantity and flood mitigation can help bolster support among urban and rural populations for strengthening the Greenbelt.
 - 2) **OFT recommends that the Province maintain its use of water features as the core 'building block's for the proposed study area and any formal Greenbelt expansion; and that agricultural land and systems should continue to be recognized as a contributing factor to the health of such water features.**

Responsible Growth

- Accommodating growth is important to make Ontario a vibrant and healthy place to live. There is often tension between the economy of development and the agricultural economy and need to protect and maintain our critical environmental features. Firm urban boundaries provide the certainty farmers need to make informed long-term decisions about investments in their operations. As land values rise and urban expansion occurs, access to rental lands and the future of agricultural land becomes less certain. In addition, this leads to increased pressure and potential destruction of critical environmental features such as our water



resources and agricultural land. The protection of these critical areas in the outer ring of the GGH is necessary to allow these places and those who live within it to thrive.

- 3) OFT recommends that the Province ensure that any proposed Greenbelt expansion boundaries are firm to prevent uncertainty and allow the associated water resources, agricultural operations, and additional features, therein to thrive.**
- The Growth Plan and Greenbelt Plan define a set of criteria and policies to direct population growth and development and balance it with adequate protection and maintenance of critical environmental features and resources. The defined GGH area is a predominant focus of land use planning in Ontario and fails to address the decline in outlying areas. A growth strategy that functions on a provincial scale could better define our future development and develop a systematic approach. This could potentially alleviate pressure on existing urban areas and environmental features and better balance growth throughout Ontario.
- 4) OFT recommends that the Province consider a provincial growth strategy that can establish a systems approach to balance growth pressures and the protection and maintenance of critical environmental features throughout Ontario.**
- Other provincial priorities or initiatives such as mineral aggregates should be addressed in potential Greenbelt expansion. It is concerning that current policies within the Greenbelt Plan and Growth Plan may give precedence to these other priorities which could damage or inhibit our water and agricultural resources. The Ministry should examine existing policies and how they might impact Greenbelt expansion. Any future formal expansion consultation should address whether revisions of certain policies focusing on matters such as rehabilitation measures and agricultural impact assessment requirements in the context of aggregate extraction are sufficiently robust to achieve the goals of watershed protection in the long term. This is to ensure consistency with provincial priorities and that balanced consideration is given to important water and agricultural features. Greenbelt expansion will require that certain policies be updated to reflect necessary changes and create an equitable balance between provincial priorities.
- 5) OFT recommends that the Province ensures aggregate extraction remains consistent with any future formal Greenbelt expansion and that it addresses the need to place critical linkages such as water and agriculture as a main priority in providing healthy, locally-grown food and sustaining life but also as a key economic driver, and for complete communities.**



Rationale and Data Sources

- The ‘building blocks’ of wetlands, cold water streams, moraines, and sand and gravel aquifers to define the area for potential Greenbelt expansion are important. The rationale for the use of these features is outlined in the public consultation document *Protecting Water For Future Generations: Growing the Greenbelt in the Outer Ring*. It is understood that the study area was also generated by examining features that are linked and contiguous to the existing Greenbelt in addition to forecasted growth pressures. However, it is unclear as to why other areas throughout the GGH were not considered. There are substantial water features and active agricultural lands to the East and in Northern Ontario that require protection such as the Kawartha Lakes and areas near Peterborough. Potential Greenbelt expansion in the provided study area for EBR 013-1661 may place additional development pressures on environmental features in areas in the eastern GGH. Rationale should be provided to better explain the process and how the Province proposes to address potential additional development pressures in other areas throughout the GGH.
 - 6) **OFT recommends that the Province addresses other areas with substantial water features and active agricultural lands such as the Kawartha Lakes in Eastern Ontario in any future consultation on potential Greenbelt expansion.**
- The Province should consider data sources outside of those defined within the public consultation document to make an informed decision when considering Greenbelt expansion. The Province should include data setting out the spatiality of agricultural areas within the GGH, which as been created by OMAFRA in their production of the Draft Agricultural Systems Land Base Map. Including these additional datasets would aid the Province in identifying other areas where important hydrological features and agricultural lands overlap. Any consideration for potential Greenbelt expansion should utilize data from the Agricultural and Natural Heritage Systems, once finalized, to inform the process and ensure that these plans and systems do not contradict one another.
 - 7) **OFT recommends that the Province use additional data, such as agricultural mapping, to better inform the decision-making process for potential Greenbelt expansion.**
 - 8) **OFT recommends that the Province utilizes the Agricultural and Natural Heritage Systems to inform any potential Greenbelt expansion process to ensure consistency throughout policy.**



Thank you for this opportunity to share our recommendations and feedback on the proposed recommendations to EBR Registry # 013-1661. We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with you further to strengthen the Greenbelt and the protection of critical water and agricultural land resources in the outer ring of the GGH.

Most Sincerely,

A handwritten signature in purple ink that reads 'Kathryn Enders'.

Kathryn Enders
Executive Director
Ontario Farmland Trust