



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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Protecting Water  
Ministry of Municipal Affairs  
Local Government and Planning Policy Branch  
Provincial Planning Policy Branch  
777 Bay Street  
13<sup>th</sup> Floor  
Toronto, ON M5G 2E5

To Whom it may concern;

**RE: EBR Registry No. 013-1661 Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 37,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

OFA's affiliated federations of agriculture in the proposed study area; Brant, Dufferin, Simcoe, Waterloo and Wellington have a direct stake in this issue.

OFA fully recognizes the value in protecting our water sources. Our livestock, our crops and our families depend on readily available sources of clean water.

Before addressing the discussion questions, we emphasize that there is only one Ontario landscape, meaning that the full range of urban, rural, agricultural, natural heritage, cultural heritage and mineral extraction land uses found across the Greater Golden Horseshoe must coexist in the same space. Decisions on whether to grow the Greenbelt, or not, and if so, where that growth should occur, must recognize that our agricultural areas provide us not only with food, fibre and fuel, but also a broad range of environmental and ecological goods and services that benefit all residents of the Greater Golden Horseshoe and beyond. These environmental and ecological goods and services include not only water cycling (flood mitigation, groundwater recharge, purification and retention), but also;

- aesthetic and recreational space,
- air quality (oxygen production, carbon sequestration, climate regulation),
- biodiversity,
- habitats for wildlife, including pollinators and endangered species
- nutrient cycling, and
- soil erosion control.

The outer ring municipalities also face the additional provincial expectation that they will accommodate the substantial future population and job growth, and the infrastructure necessary to support them, flowing from the growth projections of the Growth Plan for the Greater Golden Horseshoe. Accommodating this growth, the majority of which will primarily consume agricultural lands, will place increased demands on the remaining non-urbanized land to fulfill all of society's expectations for the provision of the full range of environmental and ecological goods and services, freshwater amongst them, along with safe and affordable food, fibre and fuel.

Distributing development investment across the province, rather than concentrating it in one area, is OFA's solution to the growing challenges that face both rural and urban communities. Investing in rural communities strengthens Ontario's agri-food sector. By supporting a strong domestic agri-food industry and investing in infrastructure that promotes economic development across the province, all Ontarians will have access to high quality, safe, local food.

Ontario farmers have a long history of practicing sustainable stewardship and protecting our ecosystems. Farmers conserve land and preserve soil, while growing safe and affordable food for us all. Sound public policy to create economic opportunities must be paired with thoughtful land use policy that protects water and soil for future generations.

New investments in Ontario's rural communities will grow existing businesses, attract new companies and boost opportunities for regional economic development. Distributing investment across the province will meet the needs of the agri-food sector and rural communities, while providing solutions to the challenges facing urban centres.

Funding formulas tend to favour urban areas; the higher costs of delivering equivalent services in rural areas are neither fully considered nor funded, and a variety of programs, such as public transit, support for universities and funding for major cultural facilities are only provided in urban areas. The result is a policy system that inherently advantages urban areas, contributing to slower economic growth in rural regions.

Distributing development investment across the province is the solution to the growing challenges that face rural and urban communities.

OFA emphasizes that distributed economic development does **not** mean we are advocating for unchecked development on our agricultural lands. We are **not** open to more urban sprawl. Our call for distributed economic development comes with conditions.

The fundamental prerequisite is that agricultural land is given even stronger protection. Clear consequences must be in place so that rural communities respect hard urban boundaries. The brownfields and greyfields that are evident across communities must be used first for commercial, industrial, and even residential growth.

Our second condition is that our distributed economic development must be planned. It cannot be hit or miss. Not everything will work in all areas. We need to collectively work across economic development offices, with the business community and governments, to identify and pursue the best form of development for communities beyond the Growth Plan.

Should the projected scale of growth cited on page 1 of the Consultation Document continue (by 50% over the next 25 years), then we advocate that the Province reopen the Growth Plan for the Greater Golden Horseshoe to incorporate the following requirements in it;

- i. Fixed, permanent urban boundaries for all settlement areas throughout the Growth Plan area,
- ii. Convert the urban intensification and greenfield development targets to mandatory requirements that are not open to appeal,
- iii. Adopt a broader, province-wide policy to distribute urban growth more uniformly across all Ontario urban areas with the capacity to accommodate growth; i.e. those with adequate development lands within their existing urban boundaries, serviced by municipal sewers, water, roads and transportation infrastructure, and
- iv. Align the Natural Heritage System policies of the Growth Plan for the Greater Golden Horseshoe with those in the Provincial Policy Statement.

From our perspective, we have yet to see any evidence in the Consultation Document or elsewhere that “growing the Greenbelt in the outer ring” to protect water is necessary and appropriate. At least eight Ontario statutes address water protection; the Clean Water Act, the Conservation Authorities Act, the Environmental Protection Act, the Great Lakes Protection Act, the Lake Simcoe Protection Act, the Nutrient Management Act, the Oak Ridges Moraine Conservation Act and the Ontario Water Resources Act. Additionally, there are specific water-related policies in the Provincial Policy Statement, the Greenbelt Plan, the Growth Plan for the Greater Golden Horseshoe, the Oak Ridges Moraine Conservation Plan and the Lake Simcoe Protection Plan, as well as Source Water Protection Plans. OFA asks: What is the evidence that the existing legislation, regulation, plans and policies do not already provide excellent protection for Ontario’s water resources? Are all these statutes and plans failing to protect our water supplies?

Farmers within the seven proposed expansion areas must be assured that current and future agricultural activities will continue, with no new restrictions. Again, the discussion paper offers no evidence that normal farm practices negatively impact groundwater resources.

While we continue to advocate for the long-term protection of our agricultural lands for their ability to produce safe and affordable food, fibre and fuel, as well as for the protection of key natural heritage features, we continue to have reservations with the “Greenbelt Plan” model as the best means to achieve these. We support its permanent protection of prime agricultural lands and natural heritage features and areas but oppose the additional land use restrictions, principally through its Natural Heritage Features and Areas Policies (i.e. 30 m setbacks from features) which we see as entirely unnecessary, given that the Greenbelt Act confers “permanent” protection against future urban growth and development on these lands, rendering additional protection unnecessarily restrictive.

It is unclear how the identification and future protection of the water features in the seven identified areas relates to the recently finalized regional Natural Heritage and Agricultural Systems for the Growth Plan for the Greater Golden Horseshoe. It is also unclear how the identification and future protection of the water features in the seven identified areas relates to existing source water protection plans. To address these shortcomings, the OFA recommends that the Consultation Document be withdrawn and rewritten to include the actions and initiatives of other provincial ministries.

On page 4 of the Consultation Document there is a negative reference to pesticides and animal waste in the context of polluting groundwater. The statement totally ignores the requirements that farmers and commercial applicators must be licensed to buy and apply chemical fertilizers, pesticides and herbicides, and also that these products must be applied in full accordance with label directions; otherwise one is in violation of the Pesticides Act. The statement also ignores the

role of the Nutrient Management Act in manure application; tying amounts of manure produced on livestock farms to sufficient acreage to avoid overapplication.

The Consultation Document (page 5) references the 4 plans under the Co-ordinated Land Use Planning Review, but fails to mention the Lake Simcoe Protection Plan, which applies to at least two of the areas identified as potential Greenbelt growth areas.

On page 22 there is a discussion on aggregates. Groundwater recharge areas, including moraines, are prime sources of aggregates that underpin Ontario's growth, both physical and economic. How will the protection of groundwater recharge areas, including moraines, for their water-related values, align with moraines, etc. as prime sources of aggregates?

### **Discussion Questions :**

#### **1. Are there additional “building blocks” features that should also be considered for addition to the Greenbelt to protect water?**

No, the use of moraines, coldwater streams and wetlands to protect water sources suffices; the three capture the essential elements of the water system.

However, we are extremely concerned that the Ministry of Municipal Affairs (see slide 13, Stakeholder Meeting PowerPoint) indicates that, “all wetlands were considered, from unevaluated to provincially significant”. To use unevaluated wetlands as a data source is unacceptable. All too often we have seen instances where municipalities, conservation authorities and MNRF have initially characterized a range of man-made or seasonal “water features” as wetlands, only to be later shown that they were irrigation ponds or areas where water was slow to drain away after a heavy rain or rapid snow melt. To give any credence to unevaluated features is, in our eyes, utterly unacceptable and unscientific. Provincial Plans, such as the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan all speak to wetlands being identified by the Ministry of Natural Resources and Forestry or a specifically qualified person, based on wetland evaluation procedures established by the Ministry of Natural Resources and Forestry. No credible water protection undertaking, that uses wetlands as a key building block, can base its policy decisions on unevaluated wetlands. If they're unevaluated, we simply do not know if they are wetlands, or irrigation ponds or lands slow to dry up after a heavy rain or rapid snow melt. Only verified water features should be a “building block” for this undertaking.

#### **2. Are there additional data sets or types of analysis that should be considered?**

There are numerous existing and ongoing water-related studies, particularly through Source Water Protection that should be used. We question why these studies are not referenced or acknowledged? The Ministry of Environment and Climate Change is conducting water quantity studies. How do these overlap with this undertaking? Are the two linked in any way? Furthermore, there are also be watershed studies done by individual conservation authorities throughout the study areas. Have these been incorporated?

The province must remain on-scope with this undertaking; i.e. focussing solely on water protection. It is inappropriate to consider unrelated data, such as species at risk occurrences, as some organizations are promoting.

### **3. Of the seven areas, are there some that are more or less important?**

In listing the seven study areas (pages 14-17), is there a priority or hierarchy in the order they're presented? OFA will not prioritize the seven areas. If the delineation of the seven areas proposed for addition into the Greenbelt is truly science-based, then why rely on public opinion to determine their priority?

### **4. Are there areas beyond the study area that you think should be considered for potential future Greenbelt expansion?**

The province must first demonstrate that these seven areas are in fact the "correct" ones and keep its focus on areas contiguous with the current Greenbelt. Are the seven areas identified in the discussion document the right ones to be considered for addition to the existing Greenbelt? Without access to the data used by Municipal Affairs to arrive at the seven areas, it is impossible to answer this question.

If the province decides to add additional areas to the Greenbelt area, the provincial government must allow sufficient time to pass to ensure that the newly-added areas are the correct ones, that they have been accurately delineated, and that any land use policies applied to these "new" greenbelt areas actually serve to foster and promote agricultural activities, and do not unnecessarily constrain every-day farming practices. The province should establish a baseline to quantify the benefits of Greenbelt. This was not done when the Greenbelt was established in 2005. Going forward with proposed expansion, the province should commit to providing baseline data on Greenbelt's benefits, to guide future expansion decisions.

The 2008 Growing the Greenbelt criteria are to apply in assessing a municipal request to be added into the Greenbelt, namely that the areas proposed for addition demonstrate connections to one or more of the Greenbelt's systems; natural heritage system, agricultural system or water resource system.

There are other areas beyond the Growth Plan area where urban development and water protection concerns exist. Are these seven areas prioritized over them? Future Greenbelt expansion, beyond the identified seven areas is an exercise for a later date; the province needs to get this undertaking right, before thinking about "next steps".

### **5. Should the province consider adding rivers that flow through urban areas as Urban River Valleys in the Greenbelt?**

The OFA offers no comments on this question, but does query what would be the role of these urban river valleys in protecting groundwater resources from urban growth and development? Is the province simply throwing out any and all Greenbelt expansion ideas, to see which ones resonate?

Given their location within existing urban boundaries, how are storm water management and sewage by-passes to be addressed?

### **6. With the range of settlement areas in the GGH, how should the Province balance accommodate future urban growth with protecting water resources?**

In the recently concluded Co-ordinated Land Use Planning Review, OFA strongly encouraged the provincial government to implement fixed, permanent urban boundaries for settlement areas

within the Growth Plan for the Greater Golden Horseshoe area, along with changing the Plan's intensification and density targets from mere targets to fixed requirements. If the province had made these two changes, we believe that the goal of protecting water resources would have been enhanced, in combination with the adoption of the recently released regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe. The province must acknowledge that protecting water resources through this Greenbelt expansion exercise will fall on the backs of farmers. No other group will bear this burden.

**7. What are other key considerations for drawing a potential Greenbelt boundary around settlement areas?**

Full compliance with the Growth Plans intensification and greenfield density targets should be an unconditional prerequisite of any future settlement area boundary expansion exercise throughout the Growth Plan for the Greater Golden Horseshoe area. To do otherwise would simply reward municipalities that failed to plan in accordance with the Growth Plan for the Greater Golden Horseshoe.

OFA is concerned that the focus on protecting water resources combined with the adoption of the regional natural heritage system for the Growth Plan for the Greater Golden Horseshoe will lead to directing future urban growth as well as the responsibility of water protection onto agricultural land.

**8. How should the province determine which settlement areas become towns/villages or hamlets, if included in a potential Greenbelt?**

Only settlements that fully comply with Growth Plan's intensification and greenfield density targets and can fulfil demand with existing municipal water sources, i.e. no need to develop new water sources or new treatment capacity, should be the focus here.

**9. Once the Agricultural System and Natural Heritage System under the Growth Plan are finalized, how should they be considered as part of potential Greenbelt Expansion?**

Farmers fear that Greenbelt expansion will bring new restrictions on how can use their farmlands. We've seen in the Greenbelt Plan that additional restrictions, primarily related to set backs from natural heritage features and areas, are imposed on agricultural lands. The 2017 Growth Plan for the Greater Golden Horseshoe adopted "Greenbelt-level natural heritage protection" for its natural heritage features and areas, which includes 30 metre setbacks. As we've noted, it is difficult to rationalize why, after the lands are "permanently protected" through Greenbelt, that more restrictive policies are then applied.

In addition, now that the Agricultural System and the Regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe have been finalized, OFA recommends that training, along with routine retaining, on the proper application of these undertakings be instituted.

**10. How should other provincial priorities or initiatives, such as mineral aggregates and infrastructure, be reflected in potential Greenbelt Expansion?**

Both mineral aggregates and infrastructure seem to trump all other land use policies. Prime agricultural lands may be protected from development, but not from aggregate extraction or infrastructure. Same too for natural heritage features. Aggregate extraction has a long-term effect



on agricultural lands. The site itself is removed from agricultural production, often for decades. Extraction below the water table results in the site's permanent loss to an agricultural end use. There are also the negative impacts of aggregate extraction on neighbouring farmlands, noise, dust and truck traffic as well as potential impacts on water wells.

#### **11. What other priorities or initiatives do you think the Province should consider?**

If the Province truly wanted to protect these water-related features for the role they play, then it should have addressed this through the recent Coordinated Land Use Planning Review, when the policies in the Growth Plan for the Greater Golden Horseshoe were under review. At that time, greater emphasis on containing growth and urban sprawl should have been the intended outcome of the review. As noted earlier, strengthening the Growth Plan for the Greater Golden Horseshoe through fixed, permanent urban boundaries for all settlement areas throughout the Growth Plan area, converting the urban intensification and greenfield development targets to mandatory requirements that are not open to appeal, adopting a province-wide policy to distribute urban growth more uniformly across all Ontario urban areas with the capacity to accommodate growth and aligning the Natural Heritage System policies of the Growth Plan for the Greater Golden Horseshoe with those in the Provincial Policy Statement would have, in our opinion, addressed the "need" to grow the Greenbelt in the Growth Plan's outer ring.

As earlier noted, at least eight Ontario statutes address water protection; the Clean Water Act, the Conservation Authorities Act, the Environmental Protection Act, the Great Lakes Protection Act, the Lake Simcoe Protection Act, the Nutrient Management Act, the Oak Ridges Moraine Conservation Act and the Ontario Water Resources Act. Additionally, there are specific water-related policies in the Provincial Policy Statement, the Greenbelt Plan, the Growth Plan for the Greater Golden Horseshoe, the Oak Ridges Moraine Conservation Plan and the Lake Simcoe Protection Plan, as well as Source Water Protection Plans. The added complexity is a clear example of the "piling-on" of red tape and bureaucracy which serves no one in the long term.

The Ontario Federation of Agriculture welcomes this opportunity to provide its perspective on Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring. We look forward to the incorporation of our recommendations and suggestions into any future growth of the Greenbelt.

Sincerely,



Keith Currie  
OFA President

KC/pj

cc: The Honourable Bill Mauro, Minister of Municipal Affairs  
The Honourable Jeff Leal, Minister of Agriculture, Food and Rural Affairs  
The Honourable Chris Ballard, Minister of Environment and Climate Change  
OFA Board of Directors