

April 29, 2008

Ms Barbara Konyl
Manager, Ministry of Municipal Affairs & Housing
Local Government & Planning Policy Division
Provincial Planning Policy Branch
777 Bay Street
14th Floor
TORONTO, Ontario
M5G 2E5



By e-mail to: greenbelt@ontario.ca

Dear Ms Konyl;

Re: EBR Registry Number 010-2866 – Criteria for Assessing Municipal Requests to Expand the Greenbelt

Thank you for the Opportunity to Input

Thank you for the opportunity to comment on the Criteria for Assessing Municipal Requests to expand the Greenbelt. We appreciate the opportunity to provide feedback regarding the Discussion Paper and to the continued evolution of the Greenbelt. We have made past submissions regarding the Greenbelt and related legislative and policy initiatives such as the *Clean Water Act*, *Species at Risk* legislation and *Places to Grow Act*.

FORCE

As you may be aware, Friends of Rural Communities and the Environment (FORCE) is a federally registered not for profit corporation. It is a citizen-based advocacy group with hundreds of supporters in Kilbride, Campbellville, Mountsberg, Freelon, and Carlisle. FORCE was formed in June 2004 to protect our natural and built environments in the face of a proposed large-scale, below the established groundwater table, aggregate development in the Northeast Flamborough portion of the amalgamated City of Hamilton. We note upfront that our organization is neither anti-aggregate nor anti-road; indeed, our area is home to some of Ontario and Canada's largest aggregate operations. We do, however, have significant issues with the pending application in its proposed location in the Greenbelt for substantive reasons; reasons that relate to source water protection, active and productive agricultural operations, acknowledged fragile natural systems, and existing rural communities.

We also believe that our organization has a responsibility to promote good government in the municipal and provincial arenas and therefore, we have a responsibility to input into the broader planning reform processes which bear upon the application processes for development proposals such as the one before our communities. The discussion paper regarding criteria for assessing municipal requests to expand the Greenbelt is clearly an opportune time to impact the ground rules about how we should be continuing to protect and grow the Greenbelt as well as how development proposals should be evaluated and approved in a municipal jurisdiction and by provincial ministries. FORCE is a member of the Ontario Greenbelt Alliance and the Water Guardians Network.

General Comments – Protect the Existing Greenbelt Too

Through the protection of environmentally sensitive and agricultural lands, the Greenbelt provides significant agricultural, environmental, cultural, recreational and health benefits. A recent report released by the Canadian Institute for Environmental Law and Policy indicates that the Greater Golden Horseshoe Greenbelt created by the McGuinty government is the most successful and useful greenbelt in the world.

FORCE has been a longstanding supporter of the creation of the Greenbelt. Theoretically, expansion of the Greenbelt should continue to provide the critical mass of natural heritage and hydrological features as well as agriculture lands and operations necessary to sustain the land designation and its core purposes. As such, in principle, we are supporters of “growing the Greenbelt” within municipal jurisdictions that request to be included.

We are concerned, however, about the provincial government’s efforts to protect the ecological integrity, source waters, and agricultural lands within the boundaries of the existing Greenbelt. We believe that defense of the current Greenbelt is required as strongly as criteria for its expansion. While there have been some high profile moves such as protection of the Duffins Agriculture Preserve, there are ongoing local development challenges to the Greenbelt and related laws which have not received the attention that they merit by the province. We specifically cite the challenge raised by the aggregate development proposal in the Natural Heritage System of the Greenbelt and in the Wellhead Protection and significant recharge areas of the Carlisle municipal drinking water system.

We would also be remiss if we did not raise the concerns of our farming members who increasingly feel that it is easier to operate as an aggregate company in the Greenbelt than as a farmer. Certainly, we understand that the Greenbelt is but one planning policy and that there are international and commodity issues bearing on the viability of agricultural operations. That being said, surely, protection of agriculture lands and provision of local food for health and food security reasons merits attention and also represents as important a reduction in GHG emissions as close to source aggregate.

We urge the McGuinty government to grow the Greenbelt but to protect the existing Greenbelt too.

Comments on the Proposed Criteria to Expand the Greenbelt

The Ontario government has indicated it is committed to considering municipal requests to expand the existing Greater Golden Horseshoe Greenbelt. This direction to grow the Greenbelt was promised by the McGuinty government during the 2007 election campaign. Draft criteria for evaluating and approving expansion proposals have been posted on the Environmental Registry (EBR # 010-2866) for public comment.

By and large, we feel that these criteria seek to ensure that any expansion proposals are broadly supported by community members and organizations, that they represent logical extensions to the existing Greenbelt, and that they are consistent with the Greenbelt Plan and other provincial planning initiatives. This should ensure greater acceptance of the Greenbelt's growth than may have been the case with its initial adoption and should ensure a sound scientific and policy basis for proceeding forward.

While the criteria generally merit support, in discussion with other Ontario Greenbelt Alliance members, we note that it is possible that criteria #3 may create an unnecessary barrier to Greenbelt expansion. This criterion stipulates that expansions should be "next to" the existing Greenbelt, implying that only areas directly adjacent to the existing Greenbelt can be considered. FORCE believes that the expansion criteria need to be flexible enough to accommodate environmentally significant or agriculturally significant lands that would represent a logical extension to the Greenbelt and yet may not be directly adjacent to it. For example, a municipality may be interested in adding lands to the Greenbelt but may be separated from the existing Greenbelt by the lands of an intervening jurisdiction. While we recognize the preference of maintaining the Greenbelt as a continuous and contiguous "band," this should not impede the Greenbelt aspirations of municipalities slightly removed from the Greenbelt boundary. **The criteria should not limit expansion of the Greenbelt to areas directly adjacent to the existing Greenbelt.**

Thank You Again

Thank you again for the opportunity to input to this important review of how best to grow the Greenbelt. We hope that it will be an opportunity for the McGuinty government to both expand this important Greenbelt initiative and to revisit how it can better defend and protect its existing land base.

Respectfully submitted,

A handwritten signature in black ink that reads "G. Flint". The signature is written in a cursive style with a long horizontal line underneath the name.

Graham Flint BSc, P. Eng
Chair & Spokesperson