

## **Attachment 2 - Response to Growing the size of the Greenbelt Discussion Questions**

### **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 important feature that supports a number of watersheds/subwatersheds, as well as provides drinking water sources for urban areas including the City of Guelph. Staff note the following regarding the areas of the moraine shown on the Growing the Greenbelt Study Area – Paris Galt Moraine map:

- The City of Guelph is a settlement area where growth has been directed under A Place to Grow, 2020.
- The study area for the moraine does not include lands within the settlement area boundary of the City of Guelph. This is consistent with the policies of the Greenbelt Plan which does not include urban centers/ settlement areas that are intended to accommodate growth within the Greenbelt Plan.
- The Moraine is a major source of groundwater recharge that is important for the protection of local drinking water sources. The City's water supply, specifically the Arkell Spring Grounds and its Glen Collector System, receives groundwater directly from recharge from the Moraine. The areas of the Moraine to the east and northeast of the City are major groundwater recharge areas for the bedrock aquifers used by the City for its municipal drinking water supply.
- The current study area mapping does not include areas of the City's water supply such as the Arkell Spring Grounds.
- The Moraine is also an area of significant groundwater recharge contributing baseflow to a number of high-quality rivers and streams (i.e. Eramosa River, Blue Spring Creek).
- Growth within local municipalities will create additional pressures to expand into the moraine areas. The Greenbelt Plan may assist in enhancing water resource management as it relates to growth within local municipalities.

The Moraine crosses numerous municipal, conservation authority and watershed boundaries thereby requiring a provincially-lead, multi-jurisdictional approach to environmental protection. That said, there are numerous existing planning tools to protect the features and functions of the Moraine which achieve this, including: the requirements of Provincial Policy Statement (PPS), 2020; A Place to Grow, 2020 and the Clean Water Act and watershed planning tools. These tools can all be used to identify features and functions of water resource systems and can be used to protect the quality and quantity of water.

## **Question 2:**

### **What are the considerations in moving from a Study Area to a more defined boundary of the Paris Galt Moraine?**

The PPS, 2020, A Place to Grow, 2020 and the Greenbelt Plan 2017 all recognize watersheds as the most meaningful scale for hydrological planning, however the study area mapping does not appear to include or consider identification of key hydrologic features and key hydrologic areas based on a watershed approach. The Province should clarify how defining a boundary to bring the Moraine into the Greenbelt will have regard for other provincial policy direction emphasizing a watershed-based approach to water resource planning given the recognition of the Moraine's role in supporting important hydrological functions. The Province should also clarify how the findings and understanding of the Moraine from the 2009 EBR Review and 2009 State of the Knowledge of the Waterloo and Paris Galt Moraines Study will be considered and incorporated.

Utilizing a watershed-based approach would also allow for the Province to develop technical criteria for including new areas within the Greenbelt Plan and the Moraine form and functions could be considered as part of this approach, such as:

- The glacial outwash deposits that also act as groundwater recharge areas and equally contribute to baseflow in local streams;
- Identifying key hydrologic features and key hydrologic areas as defined in A Place to Grow;
- Incorporating known significant groundwater recharge areas as identified through source protection programs under the Clean Water Act, and existing subwatershed studies; and,
- Delineating geologic landforms associated with the Moraine such as hummocky terrain that form closed depressions resulting in high infiltration that contribute to groundwater recharge.

The Province should also review existing local water resource information, including mapping and characterization of threats to aquifers; existing master plans and supporting tools that already exist to protect water resource systems; and existing subwatershed studies. This review should be undertaken with input from municipalities based on our detailed understanding and expertise in such local matters.

The Province should also consider the cumulative risks to water resource systems at a regional scale in relation to growth pressures and the local planning context and in relation to future urban growth requirements to clarify how the expansion of the Greenbelt Plan area is the most effective way of addressing any identified risks or gaps in information.

The expansion of the Greenbelt Plan should not include settlement areas where growth has been directed under A Place to Grow including the City of Guelph.

## **Question 3:**

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

It is unclear how the proposal to expand the urban river valley designation through Guelph meets the objectives, vision, and goals of the Greenbelt Plan, as:

- The purpose of the urban river valley designation is to connect the rest of the Greenbelt to the Great Lakes and inland lakes.
- All of the existing urban river valleys in the Greenbelt Plan provide direct connections from the areas within the Greenbelt to Lake Ontario.
- The inclusion of the Speed and Eramosa River through Guelph does not satisfy this goal, as the Speed and Eramosa are part of a watershed which drains to Lake Erie, and the Greenbelt does not have any connection to Lake Erie, nor does the scope of this growing the Greenbelt exercise contemplate creating one.
- There is also no connection provided to any inland lakes.

The urban river valley policies do not add value or provide additional protection to river valley systems as they are not based on or informed by a natural heritage system framework. In addition, urban river valley policies only apply to publicly owned lands within 60m of either side of the watercourse. They also do not provide greater protection of those lands or areas of urban river valleys that are generally subject to the greatest pressures for change and development (i.e., those in private ownership).

In addition, the urban river valley designation does not provide any additional protections beyond what the City already has in place through its Official Plan. These areas are already subject to the City's Official Plan policies that meet or exceed the Greenbelt requirements, including for the natural heritage system.

As such there is no identified benefit or purpose to designating the Speed and Eramosa Rivers through the City of Guelph as an urban river valley, and their inclusion in the Greenbelt Plan is not necessary.

**Question 4:**

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

No comment

**Question 5:**

**How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities mentioned above?**

With respect to other provincial priorities identified by the Province the City offers the following:

- The City of Guelph obtains most of its drinking water from groundwater wells whose source water capture zones proceed outside the municipal boundary. Although very little proportion of the water is understood to filter through the Paris Galt Moraine feeds into the deep bedrock aquifers from which Guelph gets its drinking water, it is important for the province to protect water supplies necessary to support municipal growth. In meeting the needs of a Place to Grow the continued use and expansion of infrastructure for the City's water supply system as well as supporting wastewater and treatment management infrastructure systems will be required to sustain and service forecasted future population and employment growth.

- In reference to the current and future importance of protection of these source waters for municipal supply the Province should ensure that the projected growth associated with the areas of the Moraine and associated water resource systems through a potential greenbelt expansion considers the provision of water resources necessary to sustain healthy aquatic and terrestrial ecosystems, while aiding in the protection of available water resources for municipal drinking water supplies to meet the future needs of Provincial growth directives.

**Question 6:**

**Are there other priorities that should be considered?**

The expansion of the Greenbelt Plan should not include settlement areas where growth has been directed under A Place to Grow, including the City of Guelph. This is consistent with the policies of the Greenbelt Plan which does not include urban centers/ settlement areas that are intended to accommodate growth within the Greenbelt Plan area.