



Dear Mayor and Council,

Gravel Watch Ontario acts in the interests of residents and communities to protect the health, safety, quality of life of Ontarians and of the natural environment in matters that relate to aggregate resources. Today, we share our comments (attached) which we have submitted to the Ontario government. It addresses several issues that concern you and communities across the province. They include the following:

- Cumulative impacts on communities of extraction industries, specifically of aggregate i.e., rock, gravel, sand, and clay;
- Preservation of prime farmland and of water resources necessary for food sustainability and renewable industries;
- Local planning to preserve natural capital through good policy, and practices;
- Resilience in the face of the twin threats of COVID-19 and climate change.

Gravel Watch Ontario recognizes the obligation of communities to protect our agricultural lands, water resources and natural environment, all of which are essential for building a climate-resilient Ontario for future generations. Gravel Watch Ontario has commented on government planning and aggregate policies for over 15 years and works with our members to ensure that policies regulating gravel

extraction do not result in permanent loss of farmland or rural landscape amenities and do not damage the integrity of the water resources supplied by the rural landscape.

We thank you for your significant work on these, offer the attached to assist you, ask you to link us to local community groups facing aggregate issues, and invite you to continue this dialogue.

Sincere wishes for good health.

Bryan Smith, President

Gravel Watch Ontario

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Date: April 19, 2021

To: [greenbeltconsultation@ontario.ca](mailto:greenbeltconsultation@ontario.ca)

From: Gravel Watch Ontario, [info@gravelwatch.org](mailto:info@gravelwatch.org)

Re: Consultation on Growing the Size of the Greenbelt, ERO number 019-3136

## OVERVIEW

The following is a submission by Gravel Watch Ontario (GWO; [www.gravelwatch.org](http://www.gravelwatch.org)) in response to the request for feedback on the Consultation on Growing the Size of the Greenbelt ERO 019-3136. Gravel Watch Ontario is a province-wide coalition of citizen groups and individuals that acts in the interests of residents and communities to protect the health, safety, quality of life of Ontarians and the natural environment in matters that relate to aggregate resources.

Gravel Watch Ontario recognizes the obligation to protect our agricultural lands, water resources and natural environment, all of which are essential for building a climate resilient Ontario for future generations. Gravel Watch Ontario has commented on government planning and aggregate policies for over 15 years and works with our members to ensure that policies regulating gravel extraction do not result in permanent loss of farmland or rural landscape amenities and do not damage the integrity of the water resources supplied by the rural landscape.

The consultation on ways to grow the size of Ontario's Greenbelt is especially timely as the COVID 19 pandemic has highlighted the critical need for food security from local sources during crisis periods and as one of the key factors in the subsequent economic recovery. Ontario has some of the best agricultural land in Canada, much of which is not protected by current land-use planning policies. These lands are a finite, non-renewable resource, and the foundation of one of the province's largest economic sectors, agri-food. Expansion of the Greenbelt will provide permanent protection of the farmland, water sources and natural ecosystems within the proposed Plan area as well as an opportunity for Ontario to become a world leader in farmland conservation. To mitigate the impact of the leapfrogging of development and aggregate extraction beyond the four Provincial Plans, Gravel Watch Ontario believes that more restrictive development policies are required throughout the province.

Overall, Gravel Watch Ontario supports the proposed expansion of the Greenbelt as outlined in the Initial Study Area of the Paris Galt Moraine and Urban River Valleys.

Gravel Watch Ontario agrees with the province that the Paris Galt Moraine is a valuable groundwater system that must be protected. The moraines continue to be under pressure for aggregate development, water takings (including below-water-table extraction), growth as well as the impacts of a changing and variable climate.

Recently an interim licence approval was granted for aggregate extraction of 750,000 tonnes of dolostone per year (for +25 years) in an ecologically rich area of the Paris Galt Moraine in Rockwood, Ontario (Hidden Quarry). Studies have shown that the quarry will impact both municipal and private wells and a provincially significant wetland. Gravel Watch Ontario is concerned that the quarry will serve as a precedent for unlimited extension to adjacent properties and an expansion into a mega quarry site.

In determination of the boundary for the expanded Greenbelt, GWO believes that the following points must be addressed:

- That the Greenbelt boundaries be significantly expanded to include more of Ontario's agricultural land
- That below-water table aggregate extraction be prohibited in the Greenbelt (refer to Bill 71, Paris Galt Moraine Conservation Act, 2019)
- That there be broader moraine protection across the province (i.e. The Oak Ridges Moraine Conservation Act) in addition to the Greenbelt Plan
- That the Moffat Moraine (part of the Paris, Galt and Moffat Moraines ANSI) be included in the Initial Study Area and mapping
- That the Greenbelt Plan policy 4.3.2 (2) (Non-Renewable Resource Policies) which restricts municipal official plans and zoning bylaws from containing provisions that are more restrictive than the policies of the Greenbelt Plan be removed and replaced with 1.4.1 (How to Read This Plan) which states that if the plans, regulations or standards are more restrictive than this Plan, the more restrictive provision shall prevail
- That provincial policy leadership is required to analyze the extent to which the cumulative effect of aggregate extraction negatively impacts groundwater recharge in the moraine areas
- That the province assess the cumulative impacts of water taking and/or permitting in the Greenbelt Plan Study Areas and across the province
- That the outwash gravel deposits adjacent to the moraine that store and transmit groundwater recharged in the moraine to river valleys, and the river valleys that contain the high-baseflow streams fed by discharge from the moraine be included in the mapped area
- Clarification is needed as to how the identification and future protection of the designated areas relate to either the Natural Heritage System or the Agricultural System for the Greater Golden Horseshoe Growth Plan
- Clarification is needed as to how the identification and future protection of the water features relates to existing source water protection policies. For example, how does Greenbelt designation of river valleys compliment and reinforce the source water protection area for the Eramosa River Valley

- In keeping with the directives of the consultation proposal that stipulates the provincial government will not remove lands from the Greenbelt, we request that the government cancel plans to build Highway 413 (GTA West) and the Bradford Bypass (Holland Marsh Highway)

The above relates to the overall protection of the agricultural land base and the connectivity of the natural heritage and water resource systems that sustain ecological and human health and form the environmental framework in south-central Ontario. As requested in the consultation document, we have outlined in detail our answers to your specific questions below.

## **QUESTION 1**

### **What are your thoughts on the initial focus area of the Study Area of the Paris Galt Moraine?**

The Initial Focus Area of the Paris Galt Moraine indicates that the government has a clear understanding of the need to expand the Greenbelt and to protect water resource systems for future generations. Recent investigative studies show that the contributions of the moraine to groundwater recharge and discharge extend well beyond the physical land form and that they influence water flow, temperatures, quality and associated terrestrial and aquatic habitats in the water system. It has been pointed out in submissions by the City of Guelph and the Grand River Conservation Authority (GRCA) that the current mapping fails to consistently include all the glacial outwash areas next to the moraine that provide the groundwater flow linkages between the moraine features and the rivers which are sustained by moraine recharge (i.e. the Eramosa River and other streams identified by the GRCA in their submission).

Both urban development and rural land-use practices such as below-water-table aggregate extraction continue to be at risk to the integrity of the hydrologic and ecological functions of the moraine. The cumulative impacts of both aggregate extraction and water taking must be considered in relation to growth and development.

GWO recommends that a Moraine Protection Act for all moraines in the Province of Ontario be established in addition to the policies of the Greenbelt Plan. We also recommend that the mapping of the Initial Study Area include outwash areas and spillways.

GWO is concerned that the Greenbelt Plan may provide less protection from aggregate extraction than current municipal plans due to the wording of Section 4.3.2 (2) of the Plan. The Grand River Conservation Authority, the Township of North Dumfries, the City of Cambridge and the Region of Waterloo oppose any extension of the Greenbelt Legislation at this time. The Region of Waterloo requests enhanced municipal consultation prior to establishment of final mapping associated with the proposed Greenbelt expansion. They advise that unless policies (language and framework) are

revised, they oppose any extension. Their response to the Province's Consultation on Growing the Size of the Greenbelt is as follows:

*"The Greenbelt Plan does not limit municipalities from adopting policies that are more stringent than the requirements of the Greenbelt Plan, except in relation to agricultural uses and mineral aggregate resources. On those topics, the policies of the Greenbelt Plan prevail and municipalities cannot adopt policies that are more stringent."*

*"The Regional Official Plan also prohibits aggregate extraction in Core Environmental Features. The Greenbelt Plan does not include this prohibition."*

*"Given that a large share of the region's groundwater recharge areas also overlap with some of the region's largest aggregate deposits, Regional staff have consistently recommended a precautionary approach when considering the extraction of mineral aggregate resources. As noted above, some of these policies are more stringent than the requirements in the Greenbelt Plan."*

## **QUESTION 2**

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

We agree with the Ontario Federation of Agriculture that the province clarify how defining a boundary to bring the Paris Galt Moraine into the Greenbelt will have regard for other provincial policy directives such as emphasizing a watershed-based approach to water-resource planning and giving recognition to the moraine's role in hydrological functions.

Development of a Paris Galt Moraine Conservation Plan in addition to the Greenbelt Plan would address and protect the features and functions of a more defined Moraine Study Area. GWO recommends that these Moraine Plans be applied province-wide and that:

- they must prohibit below-water-table extraction in clear, straightforward language
- aggregate extraction is not permitted in natural core areas (as in the Oak Ridges Moraine Conservation Plan)

The province must adhere to Section 1.4.1 of the Greenbelt Plan and not have exception for mineral aggregate resources.

## **QUESTION 3**

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

Both public and private lands must be included to provide protection, avoid fragmentation and act as corridors for wildlife. We do agree with the Ontario Federation of Agriculture that including the Urban River Valleys in the total Greenbelt land area should not be used in order to balance the loss of protected agricultural lands to development and aggregate extraction.

#### **QUESTION 4**

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

We believe that Ontario's Greenbelt should be expanded to include more agricultural land. In addition to the Greenbelt Plan, the moraines require a broader province wide Conservation Plan with more restrictive aggregate policies that include no below water table extraction.

Identifying 'food belts' in various regions of the province and by branding the goods produced there encourages Ontarians to grow and buy locally which will contribute to Ontario's economy and promote tourism comparable to the evolution of the Niagara Region's vineyards.

GWO supports Ontario Nature in that the following water resource areas should be protected:

- All moraines within the GGS, given their vital role in providing clean drinking water and mitigating floods;
- Private lands within urban river valleys, since it is primarily private lands, not public lands, that are threatened with urbanization and development;
- Coldwater streams, wetlands and headwaters of river systems since they improve water quality, provide critical habitat for fish and other wildlife and afford many further benefits such as flood control, carbon storage, groundwater recharge and recreational opportunities;
- Former glacial Lake Algonquin and Iroquois Shorelines and Plain since they feature significant groundwater discharge zones and are the headwaters of many cold water streams; and
- The Lake Simcoe Basin and Northern Simcoe County where many important ecological and hydrological features are vulnerable to land speculation and intensive development.

#### **QUESTION 5**

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

As noted by the Ontario Federation of Agriculture, it is important to acknowledge that less than 5% of Ontario's land base can support any agricultural production. From 2011 to 2016, the Census of Agriculture indicated that Ontario lost 319,700 acres of Ontario farmland. That's 175 acres of farmland per day. The current system is resulting in incremental loss of agricultural lands due to the prioritization of aggregate extraction, development and growth, over farmland preservation.

Several studies have suggested that enough aggregate supply is available currently to fuel economic growth for at least 50 years. Rather than continue to prioritize the extraction of new sources of aggregate, it would be in the province's best interest to create incentives to maximize reuse and reprocessing of aggregate materials under

safe and appropriate industrial conditions. A recent study completed by The National Farmers' Union, McMaster University and Gravel Watch Ontario revealed that 77% of aggregate extraction occurs on prime agricultural lands. Given that agricultural lands are a key economic driver in Ontario, they must be protected and prioritized from invasive industrial development such as mining, pits and quarries. The Ontario Federation of Agriculture stated that the 'interim use' of aggregate extraction as considered by the aggregate industry, undermines Ontario's food sustainability and arguably permanently alters agricultural land. This finite, non-renewable resource must be permanently protected.

Aggregate extraction below the water-table results in a permanent water surface when extraction is finished. This situation results in direct exposure of the groundwater system to contamination from airborne sources and spills, as well as removes the possibility of rehabilitation of the site to resumed agricultural use. Prior to the late 1980's, Section 3.16 of the Ministry of Agriculture and Food Guidelines Policy did not permit mineral extraction on Class 1 to 3 agricultural lands unless agricultural rehabilitation of the site was carried out. Gravel Watch Ontario believes that in conjunction with growing the Greenbelt consultation, below water table aggregate extraction should be prohibited on and full rehabilitation of all extraction sites to agricultural use is necessary. More effective and extensive monitoring and transparent reporting of existing pits and quarries is required.

## **QUESTION 6**

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

We must consider that while the Greenbelt Plan protects the countryside, it also offers green space for urban dwellers. A key consideration is the positive contribution of urban residents to rural economies through recreational uses, purchases of goods and services, visits to restaurants, farmers' markets, fairs, festivals and bed and breakfast establishments. From field to fork, the agri-food sector contributes \$47.3B to Ontario's economy and supports over 860,000 jobs.

With its general hummocky nature, sand and gravel deposits and permeable soils, the Paris Galt Moraine provides and purifies water at no cost to citizens. Establishing a Moraine Conservation Act is an opportunity to address water management concerns in a fiscally responsible manner now before the situation becomes dire. Failing to properly protect the moraine and in turn preserve the region's source of fresh water will lead to massive investments for infrastructure to provide water for the region. Furthermore, local business, farmers and industry depend upon this water source for local jobs and prosperity.



## CONCLUSION

Gravel Watch Ontario is optimistic that the outcome of this consultation process will lead to the permanent protection of the Paris-Galt Moraine. It is essential at this time that the province moves forward with the permanent protection of Ontario's agricultural lands, natural heritage and water resources through both the Greenbelt Plan and a Moraine Conservation Act with more restrictive aggregate policies. Thank you for the opportunity to comment on the proposed Greenbelt expansion in the Initial Study Area. Gravel Watch Ontario looks forward to continuing to work with the province during the next stages of this consultation and we welcome any questions you may have.

## REFERENCES AND FURTHER LINKS

Review of the State of Knowledge for the Waterloo and Paris Galt Moraines. February 2009. Prepared for: Land and Water Policy Branch Ministry of the Environment. Prepared by Blackport Hydrogeology Inc. Blackport and Associates Ltd., AquaResource Inc.

Ontario Ministry of Agriculture and Food: Revision to Food Land Guidelines Policy Regarding Mineral Aggregate Extraction (416/965).

Mike Schreiner, MPP, Guelph Leader of the Green Party of Ontario.

<https://globalnews.ca/news/7646488/greenbelt-expansion-plan-agricultural-land-concerns/>  
<https://www.sierraclub.ca/en/node/2844>  
<https://www.tvos.org/article/it-appears-the-gtha-is-running-out-of-land-for-new-homes-after-all>

[https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwiozoyf1cbvAhU2FFkFH0gCqsQFjAEegQICBAD&url=https%3A%2F%2Fdigital.library.ryerson.ca%2Fislandora%2Fobject%2FRULA%253A7741%2Fdatastream%2FOBJ%2Fdownload%2FBeyond the Built Boundary Could Developing Parts of the Whitebelt Actually Be Beneficial .pdf&usg=AOvVaw0hZ7aMMAGc0GRcLDtnkQJ](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwiozoyf1cbvAhU2FFkFH0gCqsQFjAEegQICBAD&url=https%3A%2F%2Fdigital.library.ryerson.ca%2Fislandora%2Fobject%2FRULA%253A7741%2Fdatastream%2FOBJ%2Fdownload%2FBeyond%20the%20Built%20Boundary%20Could%20Developing%20Parts%20of%20the%20Whitebelt%20Actually%20Be%20Beneficial.pdf&usg=AOvVaw0hZ7aMMAGc0GRcLDtnkQJ)

<https://www.cbc.ca/news/canada/kitchener-waterloo/doug-ford-pc-greenbelt-open-developers-mike-schreiner-1.4641575>

<https://www.ohba.ca/wp-content/uploads/pdfs/priority/Implementing the Growth Plan - April FINAL.pdf>

<https://ofa.on.ca/wp-content/uploads/2018/01/Farmland-at-risk-How-better-land-use-planning-could-help-ensure-a-healthy-future-for-agriculture-in-the-Greater-Golden-Horseshoe.pdf>

[www.gravelwatch.org](http://www.gravelwatch.org)

<https://www.tarba.org/leaders-and-laggards/>

<https://fcm.ca/sites/default/files/documents/resources/guide/infraguide-reuse-recycling-road-construction-maintenance-materials-mamp.pdf>

<https://www.thestar.com/news/investigations/2021/04/03/ford-friends-with-benefits-an-inside-look-at-the-money-power-and-influence-behind-the-push-to-build-highway-413.html>

<https://ofa.on.ca/wp-content/uploads/2019/11/OFA-submission-regarding-proposed-Aggregate-Resources-Act-amendments.pdf>

<https://ofa.on.ca/resources/ofa-consolidated-land-use-policy/>

<https://johnsonela20f.files.wordpress.com/2019/01/stephen-harper-speech.pdf>

<https://drive.google.com/file/d/12hNeggxbn66-TToSMuaXz7aFuryF-jLf/view>