



April 19, 2021

Dear Minister Clark,

Re: ERO # 019-3136 - Growing the Greenbelt

Wildlands League strongly supports this opportunity to Grow the Greenbelt. This proposal provides the biggest opportunity in a generation to leave a positive lasting natural legacy for our children.

We are in the midst of a global and rapid loss of species. Species loss of course is devastating enough, but such widespread species loss suggests that the life support systems, the ecosystems themselves, are collapsing.

We are not immune in Canada. The greatest number of endangered species live in southern Ontario, while southern Ontario has the least amount of protection and the greatest threat of development. The Greenbelt is a refuge for species, an anchor for nature and a sanctuary for families seeking connection.

Therefore, in the process of moving forward, the needs of nature and environmental experts would be the best guide to achieve the maximum outcomes in expanding the Greenbelt. The economy of southern Ontario depends on a healthy vibrant natural world. This is the opportunity to make the most of it. If we don't expand the Greenbelt as much as possible now, development will consume many rare opportunities to protect and connect nature. Once developed, the gifts of the land- to store water, provide food and support all life- shrivel. To ensure that nature and people can thrive in and around the Greenbelt, conservation must be prioritized and protection expanded. Following what nature needs will result in many gains. Farmers will benefit. Homeowners will see less flooding. Municipalities too will see fewer costs go to managing major water events. And of course, our children will have greater access to nature.

It is our greatest hope that the expansion of the Greenbelt will be a lasting legacy for this government and one for which you will be remembered for generations to come.

About Wildlands League

Wildlands League is one of Canada's pre-eminent conservation organizations, collaborating with communities, governments, Indigenous Peoples, scientists and progressive industry to protect nature and find solutions that work for the planet and for all. We are a team of relentless solution seekers with expertise in policy, strategy and conservation. We have been working in the public interest since 1968, beginning with a campaign to protect Algonquin Park. Our vision is to protect at least half of Canada's land, freshwater and ocean so that future generations can experience and benefit from Canada's irreplaceable natural wonders and ecosystems.



The Greenbelt was created 16 years ago and has been a boon to all of us, protecting natural areas like the Niagara Escarpment, the Oak Ridges Moraine and the richest farmland in the most biodiverse area in Canada. But today the 3 crises of extinction, climate and pandemic threaten to overwhelm the current Greenbelt with more extreme weather, invasive species, and crowds of people seeking greenspace. The Greenbelt sits within Canada's fastest developing urban region with 33% of Canada's population with only a small percentage of public land and only 3% in permanent legislated protection. In 2005 when the Greenbelt was created there were under 8 million people living in the Greater Golden Horseshoe (GGH). Today there are almost 10 million and that number is predicted to grow to 15 million by 2051. As a result, the GGH is both a biodiversity and extinction hotspot. Species at risk have grown in number and flood related insurance claims and infrastructure costs have skyrocketed¹. We are also suffering from substantial job losses in the Golden Horseshoe in the last year. At the same time, visitation to natural areas in near-urban area has exploded. An expanded Greenbelt is ideally situated to help with the cumulative stresses of the pandemic, climate change, urban development and biodiversity loss. But opportunities for creating and enhancing the necessary connective corridors and protected areas are dwindling.

We must seize the opportunity to do the most we can! Ontario must expand the Greenbelt to the greatest extent possible, fully protecting the remaining undeveloped areas of the Paris-Galt Moraine, other moraines and expanding and improving protection both in Urban River Valleys and watersheds outside urban areas. River Valley connections across the GGH should be protected.

We support the *Bluebelt* as identified by *The Oak Ridges Moraine Partnership*². This area would include:

- All moraines in the GGH
- Coldwater streams and wetlands
- Headwater areas
- Post Glacial Lakes Algonquin and Iroquois shorelines, and Lake Iroquois Plain.
- Lake Simcoe basin and northern Simcoe county

This is the biggest opportunity in a generation to leave a positive lasting natural legacy for our children. If we don't expand the Greenbelt sufficiently now, development will consume many rare opportunities to protect and connect nature.

¹ The costs of extreme weather events, particularly flood have been rising for years as storms have become more frequent and severe. The Insurance Bureau of Canada documents a rise in average losses from \$405 million per year from 1983-2008 to \$1.8 billion from 2009-2017. The good news is that natural areas, including moraines and river valleys and wetlands can act as 'natural infrastructure' saving both insurance claims and costly construction for built solutions. <http://www.ibc.ca/ab/resources/studies/natural-infrastructure-is-an-underutilized-option>

² <https://view.publitas.com/on-nature/protecting-water-eb-013-1661/page/1>



The Paris-Galt Moraine filters the headwaters of several rivers and the drinking water of communities from Brantford to Guelph. The Urban River Valleys are vital corridors that connect the Lake Ontario waterfront with the Greenbelt across the spine of the Golden Horseshoe. While protection of the Paris-Galt Moraine is important, there are other more than 6 other moraines in the Greater Golden Horseshoe that provide the same gifts of nature that should be protected.

Many headwaters and coldwater streams need to be protected. These have high ecological importance for rare species. Headwaters, because of their position at the top of watersheds provide the most downstream benefits. Of high importance are the headwaters of the Rouge River and Duffins Creek adjacent to Rouge National Urban Park. Improving these will improve ecological integrity for the Park and the adjacent Greater Park Ecosystem.

Maintaining and improving ecological corridors and restoring degraded land with native species will be key. Connectivity in the form of Ecological Corridors is important because it preserves plants' and animals' options to travel or migrate to find the food, shelter, water and space they need to survive. Most protected areas are too small to support species with medium to large home ranges or too isolated to provide enough mating opportunities (even for plants!) Particularly during the climate emergency, species need to be able to shift their territories to find the conditions to thrive. Ecological Corridors provide this connection- the glue that holds a conservation network together. They don't have to be 'protected' like a provincial or national park (but can be). They must not be developed into urban buildings or paved areas, but a variety of other land uses could be accommodated. They can lead from protected area to protected area or to open countryside at low risk of urbanization because of policy or circumstance. They do have to have long term management for connectivity, be designated on a map and have governance. They can be on public or private land. The IUCN has provided [guidelines](#) for establishing and managing ecological corridors. The Greenbelt is an ideal framework under which to establish corridors.

Natural River valleys stack all the benefits mentioned above. Native plants clean and filter the water, the waterways provide habitat for aquatic species. Shoreline habitats are often the richest in species diversity because they have a range of upland, water tolerant and aquatic species. River valleys are often more natural than the surrounding landscape because developing wet, flood prone areas, often with steep slopes and unstable soils is ill advised and frequently illegal. They therefore provide ideal natural corridors. They also traverse the topography from higher to lower elevations. They therefore provide ideal natural corridors linking various habitats. Nevertheless, there is still pressure to develop private lands that would interrupt this traffic of nature. Some watersheds are already beyond the natural level of plant cover needed to sustain a healthy landscape. Therefore, environmental protection and restoration and connectivity need to be prioritized for River valleys, including private lands.

Ontarian's cherish the Greenbelt. Its role in providing clean air, fresh water, local food, and accessible greenspace is more important than ever. Witness the haven of outdoor relief the Greenbelt has provided during the pandemic. We need some good news on the environmental front. This is one way



that Ontario can show its support for nature, climate, and people while protecting the land that feeds us, vital jobs and protecting us from flooding and other extreme weather.

We encourage Ontario to:

- Expand the Greenbelt by the greatest amount since its creation keeping important natural areas free from development.
- Develop a conservation network connected by Ecological Corridors, following [IUCN Guidance](#)
- Restore the landscape using native species.
- Completely protect remaining natural and agricultural areas of the Paris-Galt Moraine and its vital water resources, including the headwaters of the including the Eramosa and Grand Rivers and their tributaries.
- Expand the proposal to include features such as post glacial landforms and areas described in the Bluebelt proposal.
- Expand protection of Urban River Valleys to include private land and areas outside of cities. especially the Rouge River and Duffins Creek outside of Rouge National Urban Park and other headwaters.

Sincerely,

A handwritten signature in black ink, appearing to be 'Janet'.

Executive Director
Wildlands League
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