

To:

The Advisory Panel to the Minister of Municipal Affairs and Housing and to the Minister of Natural Resources and Forestry for the Coordinated Review for the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan:

Date: May 9th 2015

From:

People for Responsible Escarpment Development Caledon Inc./ REDC

Re: Request for Public comments on the Greenbelt Plans EBR Registry Number: 012-3256

REDC welcomes the opportunity to comment on this Review. REDC is an organization based in the Town of Caledon which is committed to the promotion of appropriate, environmentally sound development and ecosystem protection and maintenance.

The review affects all of us living in the Caledon area in profound ways as we are impacted by all four plans. As it progresses we urge the Panel to keep the following considerations in mind:

The Need to include Conservation Authorities as Tier 1 Partners

At the 4 Plans public meeting in our area we observed that the review panel does not include Conservation Authorities as tier 1 partners. We believe they are crucial to the process as they possess essential information that must be taken into account.

In our area the Credit Valley Conservation Authority has been preparing a Natural Heritage System Study for the past 5 years which has strong implications for the continuing protection of our natural environment as it includes hitherto unmapped wetlands and areas of significant environmental interest. CVCA's NHS study is about to be released after many delays and we are deeply concerned that the information it contains may not be available in time to inform the review before decisions are made.

We are familiar with the Clergy Principle which allows vital information to be sidelined if it is submitted after an official closing date. We believe strongly that the newly mapped features must be included in this review. We have been privileged to review the new maps in the draft document and have seen that many formerly unknown land and water masses have been mapped which form a cohesive picture of complex interactions between related terrestrial features and surface water resources that have implications for land use policy decisions.

Without including Conservation Authorities as equal partners in the Review we run the risk of omitting key planning considerations for changes to the 4 Plans.

The Need for Accurate Water Resources Assessment to meet Future Need

We draw your attention to water budget analysis as a planning tool.

Source Water Protection committees are being praised for doing "water budget" analyses to determine whether municipalities are able to meet existing or planned future water demand for average and drought climate conditions.

However, water budget models rely on existing data. Unfortunately data that illustrate interactions between surface and ground water simply do not exist at the present moment. Even the CVC's NHS Study does not draw on data of this type because it is costly to obtain at the scale level required for evaluation of threats to any particular area. Water budget models have typically ignored these knowledge gaps and are not valid as definitive models of how ground water and surface water interact. With some exceptions, these are at best - "guesstimates"

The science behind the new field of ecohydrology offers more exact assessments but as yet has to be adopted as the basis of modern land use planning in Canada. Until these assessments are made we should ensure that the protections afforded by the existing plans are not only retained but reinforced. The Precautionary Principle requires no less.

The Niagara Escarpment as an Internationally Designated World Biosphere Reserve

Of the four plans the Niagara Escarpment Plan is unique as it reflects an international agreement by Canada to protect a designated World Biosphere Reserve under environmental threat from human interventions. We are deeply concerned that the drive for expediency and bureaucratic efficiency that appears to be the prime motivation for this consolidated review may lead to a watering down of the protections provided by the NEP and the distinguished work of the Niagara Escarpment Commission. We have already seen how an amendment to the once highly praised Endangered Species Act has exempted the very industries that negatively impact the species under protection.

Climate Change considerations

REDC joins other environmental groups in our concern about climate change and drought. As Ecojustice has said:

"Longer droughts and more frequent extreme weather events caused by climate change can have dire consequences for human health, including introducing or exacerbating threats to drinking water. Extended dry periods can cause industrial and organic pollutants to build up on land - which an intense rainstorm can wash into water bodies all at once. Droughts can also decrease river flows and lake levels, which can concentrate pollutants. Extreme weather events can trigger floods and erosion, which risk overwhelming water treatment systems (such as filtration centres).

While it is essential to mitigate climate change, we must also adapt to coming changes. Strengthening our water standards is a key part of addressing increased risks to the safety of our drinking water."

Water Taking

Although the 4 Plan review discusses climate change and its potential for longer and more severe droughts, it does not dwell on how provincial policy on water taking and permits relate to this issue.

Water taking and its impact on drought conditions has recently been considered by the Environmental Review Tribunal in the Nestlé case. This resulted in restrictions being placed on the company's water taking during drought conditions, contrary to what the MOE was prepared to allow the company to proceed with.

As the MOE is a lead partner in the 4 Plan review we would like to have assurance that the relationship between water taking and drought conditions be fully examined when policy is being prepared. Aggregate extraction is a major industry in Caledon and a major exploiter of our commonly held water resources. We strongly urge that aggregate extractors and processors and other commercial operations should be subject to the same restrictions as Nestlé during drought conditions when water used cannot return to recharge the aquifer in a timely manner.

In this context we urge that water protection and conservation be a central concept and criterion governing the 4 Plan review. Watershed level study and management are minimum requirements for stewardship going forward and any studies should be framed according to state of the art science. Water budget studies given current knowledge are simply inadequate to evaluate threats to water supplies in the face of growing threats from climate change and the greater frequency and duration of droughts as forecast.

Financial Resources to Maintain and Protect Sensitive Ecosystems

We strongly urge that an adequate budget be assigned to the monitoring and protection of sensitive ecosystems within the Plans area of review.

Respectfully submitted

Christine Shain
REDC Strategy and Communication

On behalf of

People for Responsible Escarpment Development Caledon Inc.

info@peopleforcaledon.com

www.PeopleforCaledon.com