



February 14, 2003

The Regional Municipality of Halton  
1151 Bronte Road  
Oakville, ON  
L6M 3L1

**Attention: Ho Wong Manager, Long Range Planning**

Dear Mr. Wong,

**RE: Halton Region 2002 Official Plan Review  
Agency Review – Directions Report and Technical Reports  
File: R.13.HR**

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Credit Valley Conservation (CVC) staff wish to thank the Region of Halton for including us in the 2002 Official Plan Review Process. Our comments will focus on the Directions Report and additional comments will be summarized in Technical Appendices included within this letter. Only those documents relevant to CVC have been discussed.

#### **REPORTS REVIEWED**

- Directions Report – The Greening of Halton – Smart Growth, Smart Choices (Sept.13, 2002)
- Technical Background Paper # 1 – The Adequacy of Urban Land Supply in Halton Region (May 2002)
- Technical Background Paper # 2 – Smart Growth Index (Aug. 2002)
- Technical Background Paper #6 - Rationale and Methodology for Determining Significant Woodlands in the Regional Municipality of Halton (April 2002)
- Draft for Discussion – An Alternative Approach to Designating Significant Woodlands as Proposed in Halton Region 2002 OP Review Directions Report (Aug. 2002)
- Technical Background Paper #7 - Environmentally Sensitive Area Update (April 2002)
- Technical Background Paper #8 - Update of Significant Wetlands in the Region of Halton (June 2002)
- Technical Background Paper #9 - Update of Areas of Natural and Scientific Interest in the Region of Halton (June 2002)
- Technical Background Paper #10 - Update of Regulated Flood Plain Mapping in the Region of Halton (Jan. 2003)
- Technical Background Paper #11 - Air Quality and Official Plan Policy
- Technical Background Paper #12 - Mapping the Water Quality of Water Courses In the Region of Halton (March 2001)

**PREVIOUSLY FAXED**

**RECEIVED**

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#### COMMENTS – Directions Report

This letter focuses on the Directions Report. The directions that lead to further comments with the appropriate Technical Background Paper are included in the text or attached as an appendix.

##### Direction # 1 Setting Firm Urban Boundaries

CVC supports this direction. Staff agree that there should be no adjustments to the current urban boundaries. It should be noted in the reports and through OP policy that any proposed adjustments to the urban boundaries MUST be supported by a subwatershed plan agreed to by the appropriate Conservation Authority (CA).

##### Direction # 2 Delivering Smart Growth

CVC is generally satisfied with the directions listed within this section. Staff are unsure how the index will incorporate environmental issues (i.e. location of natural features/functions). Currently these issues are discussed and scored in only two categories. Staff are concerned that the environment is displaced within these calculations to show “Smart Growth”. We will look forward to reviewing your experiences with the Index in your report to Council.

Also discussed within this section, any proposed changes to site specific land uses in an approved secondary plan must maintain or exceed the overall development density of the plan; otherwise, a review and an amendment of the secondary plan is required. CVC is satisfied with this direction and how it reduces the pressures of urban expansion and clarifies the need to set firm urban boundaries.

##### Direction # 7 Golf Courses

CVC is supportive of recommending that Golf Courses be considered both above and below the Escarpment, subject to stringent environmental criteria. Further to this criteria CVC will also have a document available discussing the requirements for proposed golf courses (Guidelines and Requirements for the Review of Golf Course Development Proposals Within the Credit River Watershed). This document is currently in draft form and it will be brought to CVC Board of Directors in the near future. A phrase should also be included in policy that will lead an individual to other stringent requirements from the appropriate CA.

##### Direction # 8 Greenlands

8.1 Please see CVC memo # 1 dated: January 13, 2003 for current comments relating to Technical Background Paper # 6, and Alternative Approach to Designating Significant Woodlands as Proposed in Halton Region 2002, OP review Directions Report (Aug. 2002).

CVC cannot state enough the importance of including “Significant Woodlands” (as per the PPS) as a Greenlands B designation. We also support the recommended criteria in Technical Background Paper # 6.

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CVC staff support the original proposal set out in the Technical Document # 6 as the preferred approach. In addition, staff recommend that the Tree By-Law be updated in accordance with the new Municipal Act. Furthermore the enforcement of this By-Law should support this new designation. Additional information should be included within this OP review discussing how the By-Law ties into the significant woodlands designation.

8.2 ESA's – The Region has been proactive and scientific in updating their ESA's. In addition, we appreciate that protection of these important areas will be within a landscape context and as part of the Region's Greenlands System. On this basis we do not have any further comments for this section. We are looking forward to the new information regarding the updates.

8.3 CVC strongly agrees with this direction.

8.4 In addition to the information provided in Technical Background Paper # 8 – Significant Wetlands, it should be noted that while the MNR approves which wetlands and wetland complexes are Provincially Significant, it does not have sole responsibility for carrying out the necessary evaluations that form the basis for determining significance. CVC has staff trained and qualified to do evaluations and updates. CVC plays an active role in this and we are prepared to discuss this with the Region to how we can assist.

Given the accuracy of mapping and that some wetlands remain unevaluated, it is recommended that the Region ensure that they also protect all other wetlands (regional, local, etc) by way of strengthening the policy within the OP. CVC strongly encourages the region to rely on the CA's up-to-date mapping in order to protect ALL wetlands; not just those designated Provincially Significant.

It would also be appropriate to encourage the local municipalities to adopt stronger policies that protect ALL wetlands other than the Provincially Significant ones.

▶ 8.5 Agree, however CA's can provide additional mapping that include the Regionally and Locally Significant wetlands that also warrant some means of protection through policy.

8.6 Agree.

8.7 Agree, however please note that the CA's are involved in several stewardship programs. We would encourage the Region to work with CA's when focusing or building on this direction.

Staff have also recognized the need to discuss and create protection policies for Significant Valleys. As discussed in our meeting on January 17, 2003, we were asked to provide you with a definition of Significant Valleys. We have adopted the definition provided in the PPS. The PPS defines "significant valleys" as:

'significant' - *ecologically important in terms of features, functions, representation or amount, and contributing to the quality and diversity of an identifiable geographic area or natural heritage system. Criteria for determining significance may be recommended by the Province, but municipal approaches that*

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*achieve the same objective may also be used AND in regard to other matters, important in terms of amount, content, representation or effect*

*‘Valleylands’ – means an area that occurs in a valley or other landform depression that has water flowing through or standing for some period of the year.*

Direction # 10 Improving Environmental Quality- Air Quality

10.1-10.3 CVC agrees with the directions provided in this section. CVC can also provide the Region with support or resources to achieve these goals. CVC has been playing an active role in tree planting for Ontario Power Generation for the purposes of carbon sequestration.

Direction # 11 Improving Environmental Quality-Water Resources

11.1 CVC agrees with the inclusion of a wellhead Protection Zone and the limitations within them.

11.2 Agree.

11.3 Agree.

11.4 CVC does not agree that this approach be included in the OP review. Please see CVC memo # 2 for further explanation.

11.5 Agree.

Direction # 12 Improving Environmental Quality- Halton Green Fund

CVC agrees with all aspects of this direction. CVC is currently finishing a Greenlands Acquisition/Protection Strategy and a coordinated approach with the Region for securing sensitive lands could be developed through a joint CA approach. We would be pleased to present the Region with our efforts to date and the merits behind this approach.

Update to the Regulated Flood Plain Mapping in the Halton Region

This mapping represents the mapping that CVC is currently using. There were several discrepancies and gaps in this mapping and it should be noted that the CA has the detailed figures for all floodplain mapping. In areas where gaps or discrepancies exist, the policies should direct inquiries to the appropriate CA.

It was discussed in previous meeting with the Region that all rivers and streams be shown as part of the Greenlands A designation. All of these rivers and streams would be considered hazard lands and are susceptible to some form of flooding. CVC can provide the Region with this mapping.

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Other Items:


The PPS defines 'development' to include lot creation. Setbacks required from each CA should be incorporated into some type of policy that removes the hazards, significant natural features and the appropriate setback from the proposed lot lines. It has been shown that the practice of placing Restrictive Zoning on lots to reflect these setbacks do not protect features from development.

The Greenland policies should incorporate Significant Valleylands (discussed above), wildlife habitat and fish habitat as discussed in the PPS.

**CONCLUSION**

In general, the CVC supports the Directions being proposed by the Region. In particular, we encourage the Region to move forward with its current approach to the identification of Significant Woodlands. The loss of mature woodland continues to be a serious environmental issue. Thank you for the opportunity to comment on the Region's directions for the Official Plan Review.

Yours very truly,



Gary Murphy  
Senior Planner

GM/MP/KV/SS/rf

Encl.

c.c. **Town of Halton Hills**  
Attention: Bruce McLean, John Linhardt

**Conservation Halton**  
Attention: Brenda Axon, Robert Edmonson



## MEMORANDUM# 1

### CREDIT VALLEY CONSERVATION

1255 Old Derry Road, Meadowvale, Ontario L5N 6R4

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**[January 13, 2003]**

<b>To:</b> Carolyn Hart, Senior Planner - Ecology	<b>Fax: 905-825-8822</b>
<b>Firm:</b> Regional Municipality of Halton	
<b>Cc:</b> Deanne Meadus, Bob Morris, Kari Van Allen - CVC	
<b>From:</b> Mike Puddister, Senior Planner, Natural Heritage and Stewardship	
<b>Re:</b> Rationale & Methodology for Determining Significant Woodlands in the Regional Municipality of Halton (Technical Background Paper #6) April, 2002 AND An Alternative Approach to Designating Significant Woodlands as Proposed in Halton Region 2002 Official Plan Review Directions Report (August 2002)	

We have now had an opportunity to review the background paper mentioned above. The following comments build on those provided on the January draft, which were not addressed. While we continue to support this initiative, we have the following comments and/or questions:

#### **Section 1. Introduction**

- It might be helpful to provide a definition for "tree" earlier on the page; perhaps following the sentence 'Where a "tree" is any plant that will grow into a tree' (page 2).
- The definition of "tree" found in the Ecological Land Classification handbook is not the same as the definition provided in the glossary (as noted at the bottom of page 2).
- We believe that the sentence at the bottom of page 3 was meant to read: 'b) The way in which criteria are measured must be appropriate to the landscape function of woodlands...'
- No criterion is mentioned linking the habitat of endangered and threatened species with significant woodlands. The reason given for this is that 'the data set for threatened and endangered species is not complete for woodlands in Halton (page 8).' It is rare to have 'complete' information with regards to wildlife and/or wildlife habitat. As a result, planning processes related to wildlife need to be adaptive. This is especially true when dealing with species at risk. Later on in the document (page 47), it is suggested that 'these woodlands would likely be captured by a study designed to identify significant wildlife habitat in Halton Region.' This may be true, but that does not make the woodlands themselves any less significant.

### **Section 3.2 Guidelines for Regional Woodland Cover (Page 9)**

- This section begins with a discussion of the 30% watershed guideline from Environment Canada et al. but does not provide information on woodland cover within the watersheds of the Region. This is available from CVC (based on ELC mapping) for the Credit watershed portion. This is an important part of the discussion on the hydrological role of forest cover.

### **Section 4.1 Criterion One: Terrain**

- It might be helpful to mention where there is a greater risk for soil erosion due to texture (e.g. the clay-based soils of the Peel Plain).
- The first sentence of this section (page 12) was probably meant to read 'The focus of this criterion is the recognition **of the role** that woodlands play in stabilizing the landscape.'
- None of the references for Table 5 (page 15) appear on the Literature Reviewed pages. In fact, several materials referenced in this document are missing from that section. It would be helpful to have such bibliographical information included for the purposes of future research and review.

### **Section 4.2 Criterion Two: Groundwater (Page 17)**

- While the importance of headwater streams is recognized, we wish to note however, the difficulty in mapping such streams, which, by their nature, are small in size and often heavily vegetated. We would also recommend that the Region recognize the protection role played by forest cover for 2<sup>nd</sup> and 3<sup>rd</sup> order streams.

### **Section 4.5 Criterion 5, Patch Size (Page 25)**

- The second paragraph suggests that 25 hectare forest units would benefit from connectivity. While this is certainly true, connectivity should be stressed as generally having value for a variety of patch sizes. **While the Region has chosen to focus on woodlands of 2 hectares and larger, (based on OMNR guidelines), the future of the smaller woodlands remains in question. A clear statement from the Region would ensure that these woodlands are brought to the attention of the lower tier municipalities.**

### **Section 4.7 Criterion Seven, Connectivity**

- Again on page 32 the report downplays the importance of connectivity for patches less than 25 ha.
- It might be helpful to emphasize the title regional corridor (page 34) following major pathways of connectivity as the former heading is used on Table 6 (page 37).
- Why were definitions for corridor and linkage (page 34) included when corridors and linkages were not identified in this study? If it is to clarify the definitions of connectivity, perhaps they could be included in the glossary section.

## **Section 5. Spatial Analysis**

- The third paragraph on page 38 refers to major openings; how is this defined?
- Do "small non-forested inclusions" (also page 38) represent inclusions as defined on page 143 of the ELC Manual?
- We caution against removal of all plantations from analysis and recommend that a more detailed review of their functions be carried out. In particular situations, plantations may provide critical habitat or buffering of habitats, which should be considered in any protection strategy.

## **Section 5.4 Surface Water**

- How was fish habitat dealt with for the Credit River and Grand River portions of Halton Region (page 40)?

## **Section 5.5.3 Distance from Perimeter: Criterion Six &**

### **Section 5.5.4 Core Areas**

- There is some concern regarding the merging of interior wetland polygons with their surrounding woodland polygons. It is uncertain as to whether this 'soft edge' would have any impacts on wildlife or vegetation in the area. Perhaps it would be prudent to leave the interior polygon boundaries intact.

**In addition to the above noted report, CVC is in receipt of, "An Alternative Approach to Designating Significant Woodlands as Proposed in Halton Region 2002 Official Plan Review Directions Report (August 2002)"**

With respect to C Submissions by Halton Region Federation of Agriculture (Dec, 2002)

- The amount of woodlands may indeed be increasing in the rural areas of Halton. Unfortunately, the increase of woodland QUANTITY does not necessarily ensure an increase in woodland QUALITY. (For example, one could plant a 50-hectare red pine plantation that would not have the same structural & biological diversity, composition, etc. as a 50-hectare beech/maple forest). It is therefore important to adopt a policy that protects significant woodlands in both rural and urban environments.
  - With respect to 'proposed designations alienating landowners,' any new designations (with regards to significant woodlands) will not affect land-use designations already in place. The 'significant woodlands' designations are designed to prevent future development that can have negative impacts on ecological functions and natural areas.
  - Volunteer stewardship programs have been successful in the past (in increasing woodland areas). CVC continues to encourage stewardship programs, and is more than willing to
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assist with Halton Region's stewardship efforts. Unfortunately, the protection of established wooded areas often requires the use of legal channels.

- Land use outside of woodlands in rural areas does indeed differ when compared to land use in urban areas. Indeed, it is often in rural areas that woodlands with the most significant functions occur because the wooded area is in a natural state (condition). Designation is required, however, in order to prevent rural woodlands from being surrounded by urban landscapes.
- The first point addressed the need to increase both woodland quality & quantity in urban areas. On the other hand, if we designated woodlands only within urban areas there is the potential to fall far below the quantitative 30% coverage objective. Hence, the need to protect significant woodlands in both rural and urban areas.
- Lands adjacent to significant woodlands affect the functions of the woodlands themselves. Rural Adjacent Lands therefore must be designated along with their associated significant woodlands. The EIA would be used to assess whether development interfered with ecological functions of natural areas.
- Overall, we encourage that a consistent Region-wide approach should be promoted.

#### **With respect to D Alternative Approach**

- The idea of setting an overall target of 30% woodland coverage within Halton, and elsewhere is the idea behind the PPS's guidelines. BUT, it is important that this coverage is distributed across Halton Region & not just in any one area (i.e. the Niagara Escarpment), hence the importance of designating significant woodlands.
- Resources to promote stewardship, tree planting & reforestation are currently provided by CVC, as well as other conservation associations. The Region's assistance in this matter is appreciated.
- The activities listed under number 8 are required exemptions in the Municipal Act. A Significant Woodland policy therefore would not affect the occurrence of these activities.

#### **Response to Sub-Committee's January 8, 2002 Report By the Ecological and Environmental Advisory Committee**

- With regard to the removal of the first three criteria, terrain, groundwater & surface water, we feel that gap analysis needs to be carried out to determine whether or not those woodlands that protect water quantity and quality would be protected by ESA designations. If this is indeed the case, then we can accept the removal of those criteria.

- We agree with the adoption of a Community Diversity criterion. As has been mentioned before, CVC has data relating to much of the watershed and can provide insight with regard to unusual community types. Ecological Land Classification is an excellent tool for community mapping & can be employed for this process. We caution, however, that carrying out Ecological Land Classification across the region may be a quite time consuming process. In the interim, what method will be used to identify "rare" community types?
- We believe that the Federation of Agriculture's August 2002 comments illustrate the need to reiterate the protection of agricultural interests with respect to current 'normal' farm practices. We also agree that the policy for woodlands should reflect the PPS stating that, "Nothing in Policy 2.3 is intended to limit continued agricultural use."
- We agree that the document should perhaps focus on those areas newly identified as significant. While the current maps can enlighten people as to what areas of woodland are protected overall, it might be more helpful to indicate 'significant woodlands not subject to other land use designations.' A holistic map should be made available.
- We agree that perhaps clarification between ESAs and Significant woodland criteria can be provided.