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Hamilton

September 25, 2017

Ala Boyd  
Manager- Natural Heritage Section  
Ministry of Natural Resources and Forestry  
Policy Division  
Natural Resources Conservation Policy Branch  
300 Water Street  
Peterborough Ontario  
K9J 8M5

Dear Ms. Boyd,

**Re: Comments from the City of Hamilton: Criteria, methods, and mapping of the proposed regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe (EBR #013-1014).**

The City of Hamilton is providing the following comments in response to the Ministry's consultation on the criteria, methods, and mapping for the Natural Heritage System in the Growth Plan.

#### General Comments

The City of Hamilton supports the overall objective of the Growth Plan Natural Heritage System (NHS) to identify an NHS on a regional scale across the Greater Golden Horseshoe. The City also supports the identification of Core Areas and Linkages, and the recognition that restoration areas (degraded areas or lands where there is currently no habitat) may be required connect features and allow ecological processes to continue. This approach aligns with the City of Hamilton's NHS.

However, there are already existing Provincial criteria for identifying NHS features within the Provincial Policy Statement (Natural Heritage Reference Manual), the Greenbelt Plan, and the Oak Ridges Moraine Conservation Plan. The development of new criteria for the Growth Plan NHS will add another layer of policies and mapping to an already complex planning system.

Most of the City of Hamilton rural area is within the Greenbelt Plan. In Hamilton, there are only six small areas which will be affected by the Growth Plan NHS. The proposed mapping changes include areas that are already identified in the City of Hamilton's NHS or do not appear to be accurately mapped. The City suggests that the Growth Plan NHS will provide little added protection to natural features, while increasing complexity. As part of the next RHOP Conformity exercise, the City will be required to identify these areas in its Official Plan and Rural Zoning By-law 05-200. Although the changes are relatively minor, they do not reflect reality and will create unnecessary hardship for landowners by limiting the use of their property.

## Responses to EBR Posting Questions

The EBR posting provided specific questions; responses to these are provided below.

*1. Generally, do you agree with the principles? Are there other key principles?*

Yes, the City of Hamilton generally agrees with the six principles that guided the development of the NHS. In addition to these principles, a commitment to using the most current and accurate data available could also be included.

Land cover mapping was based on 2011 aerial photography and Provincial layers (hydro, streams and water bodies, and roads). The City recommends that local data and aerial photography from municipalities and Conservation Authorities be included, as it may be more accurate and up-to-date.

*2. Do you agree with the criteria for the composition and size of core areas and linkages?*

The City generally agrees with the criteria. However, the automated process using land cover did not include all existing protected areas. For example, only 90 percent of Provincially Significant Wetlands and 73 percent of cold water streams were included in the NHS. To ensure the ecological integrity of Core Areas, the City recommends that mapping include the entire extent of the existing mapped features.

*3. Do you agree that there should be consideration of smaller core areas to acknowledge highly fragmented areas with limited natural cover?*

A minimum size threshold for including core areas in southwestern Ontario was set at 100 hectares. This minimum size may be too large for the heavily populated areas of the Province, where little original natural cover remains. The City of Hamilton is not able to recommend a specific minimum size, as this should be based on scientific literature and percent natural cover, which varies across the landscape.

*4. Do you agree with the automated approach to consistently apply the criteria across the landscape?*

Yes, the automated approach allows an objective, consistent and repeatable process for mapping NHS features. However, it is important to review and refine the resulting mapping based on aerial photography, existing land uses, and EBR posting comments to ensure that it is accurate and makes sense.

*5. Do you have other suggestions for the Ministry of Natural Resources and Forestry to consider?*

Since most of the rural area of the City of Hamilton is already within the Greenbelt Plan, there are only six areas within Hamilton which are affected by the Growth Plan NHS, as shown on the attached map. Five of the areas are adjacent to the Airport Employment Growth District (AEGD), while the sixth is near Old Guelph Road and Highway 403. For Areas 1 to 3, the City undertook an extensive natural heritage system review as part of the AEGD Secondary Plan. Each of these areas is discussed below.

- Area 1 – This area is located to the southwest of Garner Road East and Glancaster Road, Ancaster (Ward 12). The draft Growth Plan NHS mapping shows a triangle of new natural heritage area on the southwest corner of this area. The area identified by the Province and has been in active agriculture for many years and there are no apparent natural areas present or linkages. In contrast, the RHOP Schedule B Natural Heritage System, identifies three natural features (Provincially Significant Wetland, stream, and Significant Woodland) in the northern edge of this area. Therefore, staff recommends that the Province revise its draft mapping in Area 1, as it does not appear to be accurate.
- Area 2 – Area 2 is found to the southeast of Glancaster Road and Twenty Road West in Glanbrook (Ward 11). The draft Growth Plan NHS mapping identifies approximately two-thirds of this area as NHS. Based on aerial photography, the site is a golf course, with streams and wooded areas. Staff recommends that the Province review its mapping of the NHS in Area 2.
- Area 3 – This area is located just to the east of Area 2, south of Twenty Road West and west of Upper James Street, Glanbrook (Ward 11). Two small areas are identified in the draft Growth Plan mapping, one on the southeast corner and another on the southwest corner. Aerial photography shows active agricultural lands with intermittent stream tributaries running across the property. However, the draft Growth Plan mapping does not coincide with the stream locations. Therefore, staff recommends that the Province revise its mapping for this area.
- Area 4 – This area is bounded by Upper James Street, Miles Road, Twenty Road East, and Dickenson Road East, Glanbrook (Ward 11). The draft Growth Plan mapping identifies three linear areas, which are Provincially Significant Wetlands and streams. These areas have been identified as Core Areas in the RHOP Schedule B Natural Heritage System. Therefore, staff are satisfied that Area 4 is accurately mapped and reflects existing natural heritage features.
- Area 5 – This large area is bounded by Fiddlers Green Road, Garner Road East, Southcote and Glancaster Roads, and Regional Road 65 (White Church Road), Ancaster (Ward 12). Generally, there are additions around the edges of the existing Greenbelt Plan NHS features. These serve to include enhance connectivity by including additional features such as streams, woodlands, and wetlands. However, the Province should review its mapping adjacent to Hamilton Airport, since a wide area has been included at the end of the western runway, which currently includes paved areas.

Also in Area 5, south of Garner Road East and west of Highway No. 6, staff recommend that the draft Growth Plan NHS extend to Garner Road, to include the entire wetland and successional area. It is not clear why this feature is cut off before it reaches Garner Road East.

- Area 6 – This area is located at York Boulevard and Highway 403 and Highway No. 6, Dundas (Ward 13). It includes natural areas already identified in the RHOP as Provincially Significant Wetlands, streams, Significant Woodland, and ESA. Therefore, the City is satisfied that Area 6 is accurately mapped.

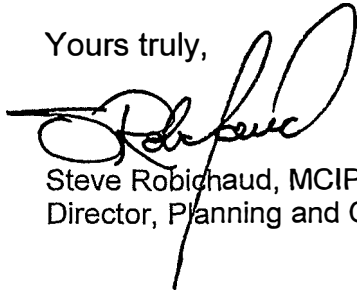
Of the six areas discussed above, Areas 1, 2, 3, and 5 are inaccurate. As part of the next RHOP Conformity exercise, the City will be required to identify these areas in its Official Plan and Rural Zoning By-law 05-200. Although the changes are relatively minor, they do not reflect reality and will create unnecessary hardship for landowners by limiting the use of their property.

Accompanying this letter are two Appendices that provide background to the recommendations contained in this letter:

- Appendix "A"  
Maps showing the differences between the City's Natural Heritage System overlay (by Area) and the Province's proposed Natural Heritage System;
- Appendix "B"  
Schedule "B" to the Rural Hamilton Official Plan.

City of Hamilton staff would like to thank-you for the opportunity to comment on the Growth Plan NHS. If you would like to discuss the City's comments further, please contact Cathy Plosz at (905) 546-2424 X1231.

Yours truly,



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Director, Planning and Chief Planner