

To: John Moser  
Cc: Bruce Finlay, Ian Cross  
File No.: L03-01-10-0031

Dear Mr. Moser,

This is in reply to your invitation to provide comment on the selection of lands to become urban in light of the OMB decision to add a further 620 hectares as part of the 5-year review of the Official Plan.

The submission is on behalf of the Greenbelt Coalition of Canada's Capital Region, a coalition of 14 environmental organizations in the national capital area (please see <http://www.greenbeltcoalition.ca/member-profiles/> for further information about our membership).

Part 1 of our submission comes to you via one of our members, the Coalition to Protect the South March Highlands and sent to staff and Planning Committee by South March Highlands-Carp River Protection, Inc.. We fully endorse that submission. It comments on Areas 1 and 2 identified in the 2009 staff report.

Part 2 of our submission follows. It comments on Areas 8 and 9.

Page 41 of the staff report identifies Area 9a as an area to be included. We have no objection.

Page 42 proposes to exclude Areas 8a-b-c-d-e-f. We endorse that exclusion. In case it should be questioned by other parties, we offer the following reasons for excluding these lands:

- a) much of the land in question slopes toward the Leitrim PSW and probably acts as a recharge area for it. The long term hydrology of the PSW needs to be protected. Leitrim Wetland is older than Mer Bleue and is a hotspot of biodiversity;
- b) the wetland area east of the racetrack has a good population of turtles and is likely habitat for Snapping and Blanding's Turtles;
- c) there is a nice mature woodlot on the Rideau-Carleton raceway that borders the wetland area;
- d) there are other wetland areas near the south end of the Leitrim Wetland;
- e) there is part of a population of naturally occurring columnar White Cedar, a very rare form in the City;

f) there is a population of the provincially rare (S3) Handsome Sedge (*Carex formosa*);

g) Area 8f includes a beautiful series of ancient Champlain Sea beach lines that are easily visible on aerial photos. The higher parts, toward Rideau Road, were among the earliest pieces of land to emerge from the Champlain Sea (one of a series of islands that stretched westward toward the Burnt Lands) and is a likely area for archaic Aboriginal activities and hence cultural artefacts.

Also on the page 42 exclusion list are Areas 9b, 9c.1, 9c.2 and 9d. Should more land be required in exchange for exclusion of other land now proposed for development (such as Areas 1a, 1bW, 1cW and 1h), then we would suggest consideration of:

- Area 9b (29.0 ha gross developable);
- Area 9c.1 (17.7 ha), provided a 30-meter buffer is maintained on either side of Findlay Creek;
- Area 9d (13.7 ha); in addition, we believe the staff report's annotation of 3 ha of woodland there is in error.

Area 9c.2 (woodland) should indeed remain excluded, to protect Findlay Creek and provide connectivity with the adjacent Rural Natural Feature area.

All the areas we wish to see remain undeveloped are part of the Coalition's proposal for expansion of the Greenbelt in the context of the NCC's review of the Greenbelt Master Plan. Some of these areas may also be included in the NCC's own proposed expansion in the area south of Leitrim. On the precautionary principle alone, all of these areas should be set aside at this time.

We look forward to staff's recommendations.

For the Greenbelt Coalition,

Erwin Dreessen  
on behalf of Sol Shuster, Chair