



GRAND RIVER
ENVIRONMENTAL NETWORK

Provincial Grow the Greenbelt Consultation
Minister Steve Clark and the Environmental Registry of Ontario
Ministry of Municipal Affairs and Housing
777 Bay Street
Fourth Floor, Suite 425
Toronto, Ontario
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RE: Growing the Greenbelt #019-3136

On behalf of the Grand River Environmental Network (GREN), a diverse group of citizens and community groups across the Grand River Watershed, please find below our input on the Provincial Growing The Size Of The Greenbelt Consultation.

Since the creation of the Greenbelt in 2005, GREN has been asking for the Greenbelt protection that so many other GTA municipalities take for granted. It is fantastic to finally see the provincial government considering significant Greenbelt expansion into Waterloo Region and the Grand River watershed along the Paris-Galt Moraine.

However, the proposed expansion is not nearly ambitious enough and despite Minister Clark stating there would be no policy changes, there needs to be important policy updates to ensure that the stronger local protections in Waterloo Region are not weakened or overridden by Greenbelt expansion.

Please pay particular attention to our responses to Consultation Question #5 where we discuss Waterloo's unique success with Smart Growth and raise numerous issues that need to be addressed prior to any Greenbelt expansion into Waterloo Region.

The Grand River Watershed has a population of almost 1 million people, the vast majority of our citizens rely on groundwater as our sole source of drinking water as we have thus far

avoided expensive water pipelines to the Great Lakes. We are some of the fastest growing communities in North America and our natural areas as well as our groundwater recharge areas need the Greenbelt protections enjoyed by so many others in Ontario.

Future generations are counting on our environment and natural resources being adequately protected. Climate change will require increased resilience and sustainability with local food and a strong agricultural sector being more important than ever.

Expanding the Greenbelt to the Grand River watershed can address all of these things and ensure the much-needed balance to our rapid growth for the long-term success of our communities.

Question 1: What are your thoughts on the initial focus area of the Study Area of the Paris Galt Moraine?

The initial focus area is totally inadequate.

GREN is very supportive of Greenbelt expansion to the Paris-Galt Moraine however, Greenbelt expansion needs to be far more ambitious and the concerns raised by the Region of Waterloo regarding stronger local protections being weakened needs to be remedied by the province.

GREN questions why only the Paris-Galt Moraine is being considered for expansion when it is the adjacent Waterloo Moraine that the vast majority of Waterloo Region residents depend on for almost all of our water needs (even more people are dependent on the Waterloo Moraine for water than the Oak Ridges Moraine). Look at any map of Waterloo Region and it is hard to explain why only the smallest of our two essential moraines is being considered for Greenbelt protection.

In addition to the Waterloo Moraine, other many other essential parts of the Grand River watershed need to be incorporated into the Greenbelt including:

- additional parts of the Paris Galt Moraine including headwaters of the Speed and Eramosa Rivers, additional lobes south of Brantford extending into Oxford, Norfolk, and Haldimand Counties, and the important headwaters areas of so many Hamilton/Niagara creeks and rivers between the City of Brantford and the existing Greenbelt boundary/Brant County Line,
- the entire watercourse of the Grand River,
- the Orangeville Moraine areas in the northern reaches of the Grand River watershed at the headwaters of the Grand River.

Also, across the entire Outer Ring there are numerous areas that have been facing significant development pressures for decades and need Greenbelt protection including:

- most of Simcoe County including the Oro Moraine, the Singhampton Moraine, and the Gibraltar Moraine, as well as significant areas around Lake Simcoe,
- much of Dufferin County including the Orangeville Moraine area,
- headwaters areas of Northumberland County,
- additional parts of Niagara Region including additional tender fruit areas previous excluded from the Greenbelt.

Finally, we strongly recommend that the province consider the areas identified in the recent Bluebelt collaboration be protected by the Greenbelt. Please see Bluebelt Map in Appendix A for specific details.

Question 2: What are the considerations in moving from a Study Area to a more defined boundary of the Paris Galt Moraine?

The province must better utilize science-based approaches for mapping and groundwater resource identification to ensure that all key hydrological and ecological features are identified and protected.

Indigenous communities need to be part of meaningful consultations and indigenous protected areas need to be part of future considerations.

Question 3: What are your thoughts on the initial focus area of adding, expanding and further protecting Urban River Valleys?

The two current proposed Urban River Valleys are so small and limited it is comical and insulting to the citizens of Ontario. Private lands must be included in the URV designation and far more waterways in the Paris-Galt Moraine need to be considered such as the Grand River and so many tributaries.

With almost 1 million people dependent on the Grand River, GREN recommends that the entire Grand River be designed as a URV, particularly since the river has already achieved global recognition and awards for its importance and successful management to date. Protecting entire river valley corridors rather than just piecemeal urban sections on public lands only will provide far more effective protection and better protect these essential ecosystems.

River valleys that should be protected as Greenbelt URV's within our Grand River watershed include:

- The Grand River
- The Nith River
- The Conestoga River
- The Speed River
- The Eramosa River

Other important river valley's requiring URV protection elsewhere in Ontario include:

- Duffins Creek
- Carruthers Creek
- Twelve Mile Creek
- Gages Creek
- Cobourg Creek
- the Nottawasaga River
- the Holland River
- the Talbot River
- the Ganaraska River

Significant urbanization and new development pressures are threatening the health, resilience, and even basic functioning of all of these waterways. To sustain their ecosystems and protect residents from flooding these entire corridors including private lands must be included in the Urban River Valley designation.

Question 4: Do you have suggestions for other potential areas to grow the Greenbelt?

Please refer to our responses in Question 1 for specific areas that we are recommending the province protect with the Greenbelt and URV designations.

Overall, the Greenbelt needs to ensure that all areas of high ecological and hydrological value are properly protected. This includes:

- all moraine areas in southern Ontario,
- all agricultural lands – particularly those facing threats destruction from urban sprawl,
- all headwater areas for creeks, streams, rivers and wetland areas,
- all natural heritage systems (NHS).

Question 5: How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities mentioned above?

The protection of our natural resources, natural capital, and natural ecosystems must take priority. Without clean water, functioning ecosystems, and adequate food there will not be functioning communities or economic success.

Waterloo Region is proving firsthand how to successfully balance thriving rural townships (our farmers are the most profitable in Canada) adjacent to dynamic, rapidly growing cities that are leading the world in so many ways.

Our Smart Growth cities are growing within their urban boundaries – easily achieving rates of intensification claimed to be impossible elsewhere. Our investment in public transit including light rail transit is driving a revitalization of our downtown cores that is the envy of most other Ontario communities.

Our economy is booming, leading companies from around the world are locating here while our region is also renowned for start-ups and new companies formed here that become global leaders.

Our universities are attracting top students and researchers from around the world and our leading science, biology, environmental, ecology, hydrology, and nanotechnology programs along with the Centre for Groundwater Research as well as the Water Institute at the University of Waterloo (with over 150 faculty members and 300 graduate students focussed just on water) take advantage of the nearby countryside and groundwater recharge areas to develop a better understanding of our natural world and develop the solutions that Ontario is going to need in an era of global climate change.

Every resident of Waterloo Region is just a few minutes from nature, greenspace, and the countryside. Our farmer's markets are world-famous, almost every farm participates in some sort of farm-gate sales, and our residents enjoy some of the highest quality of life in the world.

We need provincial Greenbelt expansion to add another important layer to our essential municipal and regional protections. However, we need to ensure that the strongest of any regulation applies and that the Greenbelt doesn't override, erode, weaken, or destroy our successful local protections such as our Protected Countryside, Countryside Line, Environmentally Sensitive Landscapes (ESL's) and Environmentally Sensitive Protected Areas (ESPA's).

Currently, area municipalities, the Grand River Conservation Authority, and the Region of Waterloo are all recommending against Greenbelt expansion because of significant concerns that our local protections are at risk.

We need the province to update Greenbelt policies to make it very clear that:

- local municipalities, counties and regions are encouraged to have stronger local protections,
- that the strongest of any protections will always prevail,
- the province will help to defend local protections that come under attack and assist in any situation where there is an attempt to undermine local protections or substitute weaker Greenbelt provisions instead.

Additionally, the provincial government needs to:

- revisit market based land needs assessments to ensure that Ministry of Municipal Affairs and Housing population forecasts agree with Ministry of Finance population forecasts,
- revisit Growth Plan densities and increase densities to previous levels to ensure that all communities have the required densities to support public transit,
- ensure that other Ontario communities meet at least the levels of densities currently and easily being achieved here in Waterloo Region and that these communities are complete communities with active transportation, housing choice, mixed uses, and stay within existing urban boundaries,
- cancel unsustainable highway projects such as Highway 413, the Bradford Bypass, the Mid-Peninsula Highway, 401 expansion, Highway 404 expansion and other unsustainable, expensive road projects that undermine climate change efforts and work against the strong public transit network that Ontario requires to be globally competitive in the future,
- end the use of undemocratic and extremely unpopular Ministerial Zoning Orders (MZO's) that bypass public consultation, public engagement, environmental assessments, and so many other aspects of what most Canadians consider good government and proper process,

Question 6: Are there other priorities that should be considered?

The future quality of life for all Ontarians needs to be considered. Are we living within the carrying capacity of the land and our ecosystems? Are we preparing enough for climate change and the increased resilience it is going to require? Are our current processes and activities sustainable? What will future generations think of our current activities? Will your children be proud of your actions?

There are so many things that need to be considered. Ontario is already a global leader in so many areas and has the potential to be even more significant of a leader however climate resilience, health and well being are going to have to be priorities if we are to have long-term, sustained economic success.

We can't have short-term success at the cost of our long-term quality of life. The Greenbelt is perhaps the most significant legacy that any elected official or government staff member will leave for future generations. Looking back at the end of your career expanding the Greenbelt will likely be the top achievement you will cite and be recognized for.

Please ensure that all areas of southern Ontario facing rapid growth and development pressures have the long-term benefit of accompanying Greenbelt protection to ensure the integrity of essential water and environmental resources.

Additional Comments

GREN would also like to make the following observations and recommendations:

- **Growing the Greenbelt** – Waterloo Region has worked for years to achieve local solutions to balance our significant growth and to protect our natural heritage, farmland, water aquifers and environmentally sensitive areas. While our Regional Government has been very progressive and innovative, an expansion of the Provincial Greenbelt following our Countryside Line and Protected Countryside designations would provide considerable reinforcement to the protections we have been developing and putting in place along the Waterloo Moraine and the Paris-Galt Moraine landscapes.

Waterloo Region is one of the largest communities in North America almost solely dependent on groundwater for our drink water sources. Greenbelt expansion atop our local protections would help to better protect our headwater and groundwater recharge areas helping to ensure a safe, secure and renewable supply of water for our thriving Region as well as helping to provide improved future resilience.

It is important that the Greenbelt mapping align with our local protections to ensure consistency and that all levels of government are working together. We can't have a situation where one part of a farm is captured in our Protected Countryside designation, while another part is in the Greenbelt and another section is part of the Natural Heritage System (NHS) and yet none of the boundaries coincide or align. It would be management and public relations nightmare.

Our local municipalities, Region of Waterloo and the Grand River Conservation Authority have already done considerable work on our local protections and a Greenbelt overlay of these existing protections should be extremely easy and efficient.

- **Prohibit Greenbelt Boundary Changes and Land Swaps, and Freeze Urban Boundary Expansions** – Waterloo Region's Countryside Line designation and the Greenbelt will only be successful if they provide long-term confidence and assurance to our farmers that they can invest in their lands and will still be farming a generation from now.

Any boundary changes shatter this confidence, create doubt/uncertainty and drive speculation. The Greenbelt needs to stand strong for generations – any changes to its boundaries, the removal of lands, or weakening of protection will seriously threaten all aspects, objectives, and the long-term success of the Greenbelt.

Decades of designated land supply already exist – even here in Waterloo Region, which developers like to call “land-constrained.” More than 3,000 hectares of land that have been designated for development now sit in undeveloped inventory. Additional urban boundary expansions are not required for decades, if ever, even at current rapid growth rates. Successful urban intensification, combined with generational trends and demographics, have invalidated any “justifications” for expanding urban boundaries.

- **Expand Buffers and Rural Support Programs** – Governments need to expand and strengthen buffers to better protect natural features and to ensure that agriculture has the space it needs to thrive. The Province should implement rural support programs for agriculture to ensure that farmers can move machinery and have the required nearby infrastructure (feed mills, implement dealers, farmers markets, farm gate sales opportunities) for long-term success.
- **Low Impact and Strongest Regulations** – The Province should ensure that activities permitted within the Greenbelt are low impact and align with the objectives of the Greenbelt. The Province should ensure that, when there is a difference between local regulations and provincial regulations, the most protective of the two applies.
- **Aggregates** – Better environmental protection from aggregate extraction operations is required. Pits and quarries need to be kept out of environmentally sensitive areas and extraction below the water table should not be permitted anywhere. More enforcement and actual pit rehabilitation is required.
- **OMB/LPAT Reform** – The OMB/LPAT needs to be reformed yet again so that it better represents citizens - not overwhelmingly developers.
- **Approval Expiry Dates** – Development approvals need to have a set expiry date (perhaps five years) after which a re-application would be required that ensures that development meets the most recent standards.
- **Improve Natural Heritage Protection** – All four Greenbelt plans need to be better aligned, share more common definitions, and work to better protect natural heritage with larger buffers, fewer infrastructure projects such as highways and pipelines cutting through rural/environmental areas. Improved stewardship funding is required. The Greenbelt Foundation's funding needs to be renewed at higher levels and new programs developed to better support Greenbelt farmers, farm markets, stewardship programs, and restoration projects.

Conclusion

Although less than 20 years old, the Greenbelt has been incredibly successful and embraced by the vast majority of citizens across Ontario.

It is successfully guiding growth, protecting rural lands, stewarding ecosystems, and ensuring greenspace for generations to come. However, it needs to be expanded to areas such as the Grand River watershed, which are facing considerable growth and leapfrogging pressures.

Thank you for this consultation and we welcome the opportunity to work with provincial MPPs and officials in the months and years ahead. Please expand and strengthen the good work the provincial government has been doing on the Greenbelt and help to ensure the highest future quality of life for all Ontarians.

Sincerely,

The Executive and Membership of the Grand River Environmental Network
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Appendix A

Bluebelt Map of Important Natural Areas and Water Features for Greenbelt Inclusion

