

Kevin Thomason and the Thomason Family  
1115 Cedar Grove Road  
Waterloo, Ontario  
N2J 3Z4

April 19, 2021

Provincial Grow the Greenbelt Consultation  
Minister Steve Clark and the Environmental Registry of Ontario  
Ministry of Municipal Affairs  
777 Bay Street  
Toronto, Ontario  
M5G 2E5

RE: Growing the Greenbelt #019-3136

Minister Clark and Provincial Staff,

For over 20 years, I have been working on large scale land protection – originally on a Provincial Greenway in the 1990's, then on the initial seeds of the Provincial Greenbelt in 2003, 2004 and 2005.

I quit my job and volunteered full-time for four years to develop our own local protections here in Waterloo Region from 2006 to 2010 when we were left out of the Greenbelt, yet still targeted for significant future growth.

For several years I was the President of Ontario Nature and helped to lead the organization's tens of thousands of members across the province.

More recently, I have been working with the Europe Union on the creation of the 15,000km long European Greenbelt spanning 25 countries along the path of the former Iron Curtain, helping them learn from our experiences here in Ontario.

No longer am I a single environmentalist working around the clock for much needed change though, now I am a husband and a father of two young toddlers who love the outdoors and who we need to be ensuring will have a promising future with a high quality of life – including clean water, greenspace, fresh air, and local food.

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.

Yet, the proposed expansion is not nearly ambitious enough and we must heed the recommendations of Region of Waterloo Staff to ensure that there are policy updates to ensure that our stronger local protections in Waterloo Region are not weakened or destroyed by Greenbelt expansion.

My family and the almost 1 million other residents of the Grand River watershed rely on groundwater as our sole source of drinking water. Our communities are some of the fastest growing communities in North America and facing unprecedented climate change and growth pressures.

As rural residents, our family is totally dependent on our countryside being adequately protected. Climate change will demand increased resilience and sustainability. Local food will be increasingly important. We will be more at the mercy of the carrying capacity of our land than ever.

Expanding the Greenbelt to the Grand River watershed can address so many challenges and ensure the needed balance to our rapid growth.

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

The government needs to be far more ambitious and the initial focus area is totally inadequate.

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 properly addressed by the government.

It is the Waterloo Moraine that my family depends most on – living on a rural 52 acre property that is 90% environmentally sensitive with amazing wetlands, fens, bogs, creeks and the rare meromictic Sunfish Lake.

It's essential that the Waterloo Moraine receives Greenbelt protection as well. More than 500,000 Ontario citizens depend on the Waterloo Moraine for their drinking water and it is confounding to see the provincial government proposing to protect the Paris-Galt moraine while completely ignoring the adjacent Waterloo Moraine.

Many essential parts of the Grand River watershed need to be studied for Greenbelt inclusion including:

- the entire Waterloo Moraine
- 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 length 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 previously excluded from the Greenbelt.

We strongly recommend that the province consider all of the areas identified in the recent Bluebelt collaboration be protected by the Greenbelt. Please see attached Bluebelt Map below.

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

The provincial government 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.

First nations 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 proposed Urban River Valleys are way too small and entire watercourses need to be included in the Greenbelt – not just urban public portions. 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.

The entire Grand River should be designed as a Urban River Valley given 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 Question 1 above for areas requiring Greenbelt and URV protections.

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?**

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

Waterloo Region is thriving and is showing firsthand how to successfully balance thriving rural townships (our farms are the most profitable in Ontario) adjacent to dynamic, rapidly growing cities.

Waterloo's 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 renown for start-ups and new companies that become global leaders.

Our family is lucky enough to live in a rural area and 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 applies and that the Greenbelt doesn't override, erode, weaken or destroy our successful local protections.

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-Penninsula Highway, 401 expansion, 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?**

My children are counting on you. 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 it 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.

### **Conclusion**

I have been lucky to have had a front row seat and participate in so much of the creation of the Greenbelt. It is exciting to finally see the government proposing long sought expansions. Similar to protected areas around the world, our Greenbelt has been incredibly successful and embraced by the vast majority of citizens across Ontario with more than 90% of Ontarians wanting to see it expanded.

It is successfully guiding growth, protecting rural lands, stewarding ecosystems, and ensuring greenspace for generations to come. However, we need it here in Waterloo Region as much as it is integral to so many other parts of the province.

Please leave a positive lasting legacy and finally provide the Greenbelt protections that we have been seeking for decades. Please feel free to reach out anytime with any questions or if there is any way that myself or my family could assist.

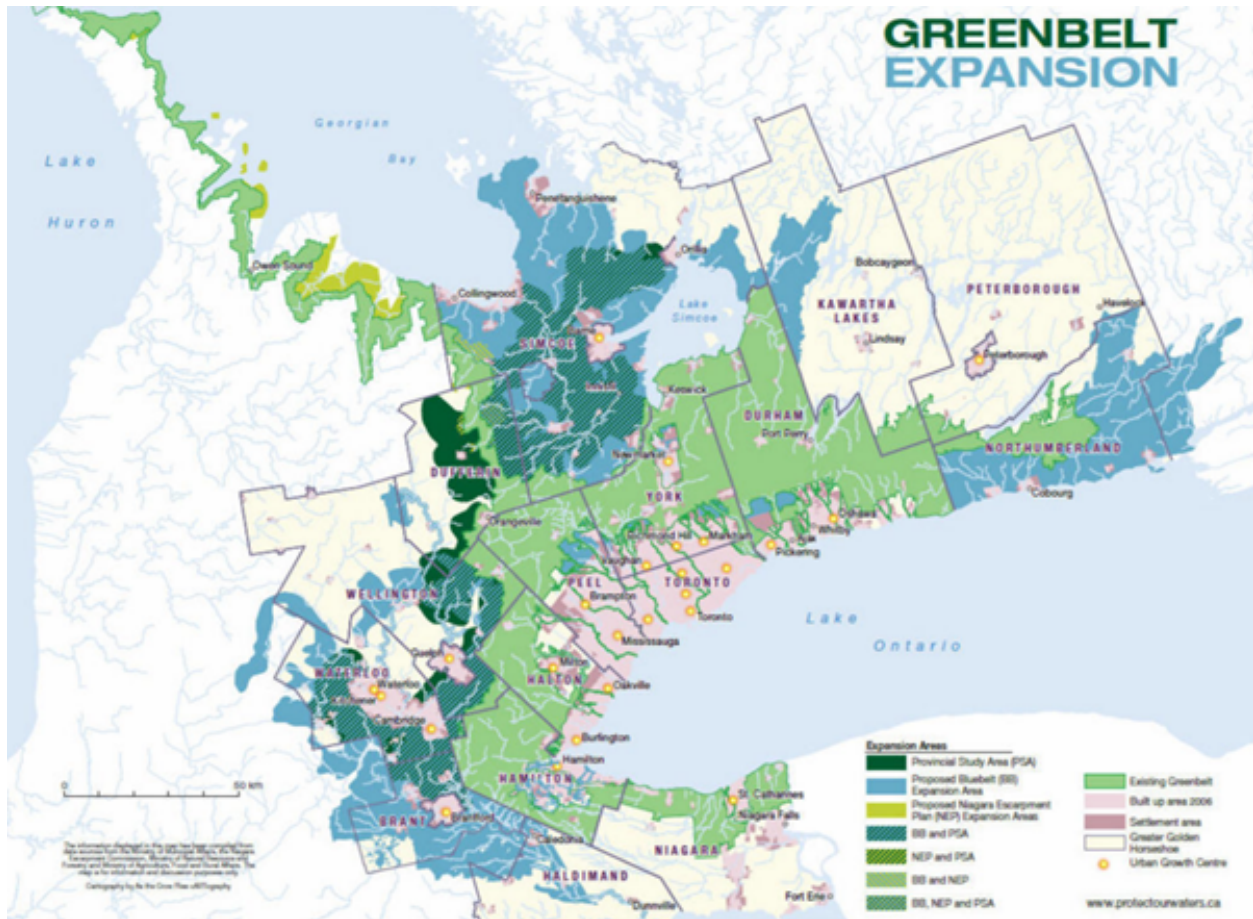
Sincerely,

Kevin, Stephanie, Skylar, and Willow Thomason.

[kevinthomason@mac.com](mailto:kevinthomason@mac.com)

(519) 888-0519

## The Bluebelt Map Showing Lands Needing Better Protection



These lands should form the minimum of the protected areas in Ontario and could advance and enhance the Greenbelt, sustainably guiding growth for generations to come.