

January 13, 2018

Via email: protectingwater@ontario.ca

Protecting Water
Ministry of Municipal Affairs and Housing
Provincial Planning Policy Branch
777 Bay St.
13th Floor
Toronto, ON M5G 2E5

**Re: Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring
EBR Registry Number: 013-1661**

The following submission has been prepared by a residents' group, Save Our Water, based in Centre Wellington, Ontario.

We applaud the Ministry of Municipal Affairs and Housing for its initiative in striving to protect water resources in the Outer Ring of the Greater Golden Horseshoe, and appreciate the opportunity to provide input on this potential Greenbelt expansion.

Our comments are focused on Study Area 2: the Orangeville Moraine. The Centre Wellington area at the west boundary of this study area has recently become a focus for a controversy over wise groundwater management. Under the Places to Grow initiative, the province targeted Wellington County to grow by 46% by 2041. The county planners, in allocating this growth among seven municipalities, mandated the urban area of Centre Wellington to accept by far the lion's share of this county's growth. The Fergus and Elora-Salem urban area is to grow by 100%, adding 22,000 new residents by 2041. This new population will require water, and we rely entirely on groundwater.

This county planning decision was based primarily, or completely, on the wastewater treatment facilities in Fergus and Elora, located alongside the Grand River into which wastewater effluent is discharged.

At the time of this population allocation, little consideration was given to available drinking water. In fact, this area was deemed by the MOECC to be an area of some concern for drinking water.

At the same time, a large water bottling facility south of Guelph has proposed removing from Centre Wellington, at the western edge of Elora, a volume of water equivalent to that produced daily by 3 of Centre Wellington's 8 municipal wells. As well as concern about the volume of water proposed, if approved for a permit to take water, extraction from this well would remove from the equation the entire west side of Elora as a possible location for a municipal well, forever. (This is considering that, as has been shown to be efficient, high capacity wells should be 2 kilometres apart in this region).

Already, this municipality has a history of difficulties in locating sites for municipal wells that can produce the capacity and quality needed for the present residents, without even considering the mandated population growth. On the east side of Fergus, a deep well with high pumping rate for municipal purposes would produce water of compromised quality, as has been demonstrated historically in this area.

Considering the Greenbelt potential Study Area 2, this study area's western boundary follows the eastern edge of the town of Fergus. The Orangeville Moraine feature of this study area further extends in a westward arc adjacent to and north of the urban boundary of both Fergus and Elora-Salem to meet the Elmira Moraine in the Region of Waterloo just to the west of Salem. This area is part of the recommended 'Bluebelt', which was proposed by the organizations and individuals supporting the 'Grow the Greenbelt' initiative.

The geographic moraine area along this arc should be managed for the long-term protection of this region's natural groundwater recharge area, mitigating climate change impacts, and ensuring sustainability of drinking water for Centre Wellington's future residents. Centre Wellington has no other practical options for municipal water available other than groundwater. Extension of the Greenbelt boundary to include this moraine area would provide this protection, adding a layer of regulation strengthening municipal decisions by which the urban growth boundary lines on the planning maps would be enforceable over the long term.

As we see it, the province cannot have it all ways. The province cannot target this community for 100% growth in the next 24 years, while at the same time permitting 1.6 million litres of water to be extracted daily by a private industry, and at the same time, as well, permitting the natural recharge area for this municipality to be paved over. We need to protect this important ecological recharge area from inappropriate development and urban encroachment.

We strongly recommend that the boundary of Study Area 2 be enlarged to incorporate the section of the Orangeville Moraine that extends across the northern boundary of the Township of Centre Wellington.

In addition, we support protection of the Grand River valley where the river flows through this increasingly urban area.

In Wellington County, elected representatives of the Puslinch and Erin municipalities have expressed concern over potential expansion of the Greenbelt in the Waterloo - Paris Galt Moraine Study Area in the southern portion of the county. Neither of these municipalities has been mandated for growth. The Township of Centre Wellington, however, mandated for accelerated growth and with an already vulnerable drinking water system, needs the extra protection the most.

Thank you for your consideration of this submission.

Sincerely,

(Save Our Water)