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Submitted by email: [glo@ontario.ca](mailto:glo@ontario.ca)

Ministry of the Environment, Conservation and Parks  
Great Lakes and Inland Waters Branch  
40 St. Clair Avenue West, Floor 10  
Toronto, ON M4V 1M2

**Re: Response to Request for Comments  
Modernizing Conservation Authority Operations  
Conservation Authorities Act ERO #013-5018**

Green Durham Association (GDA), a not for profit charitable organization, has for many years worked in close partnership with the Toronto and Region Conservation Authority (TRCA), Lake Simcoe Region Conservation Authority, Uxbridge Township and other partners in adding to conservation land holdings, in the creation of trail and natural heritage linkages connecting conservation lands and communities, and in the stewardship of these lands. GDA is dedicated to protecting the forests, farmlands and natural areas which lie northeast of Toronto in Uxbridge, North Pickering and adjacent Greenbelt lands.

Our comments reference not only proposed changes to modernize the Conservation Authority operations but also suggest action with respect to the funding required by conservation authorities to oversee the public conservation lands they own and/or manage. Without the necessary funding in place, important and assigned responsibilities will lead nowhere.

Conservation Authorities (CA) developed in the 1940's and 1950's, as part of a movement to protect and improve watersheds. Additionally, other important benefits of conservation land holdings have evolved since their inception. Most of the population in Ontario now live within the jurisdiction of one of the 36 Conservation Authorities ([www.conservationontario.ca](http://www.conservationontario.ca)), and development has expanded around many of the lands which were once remote. The Greater Toronto Area is now one of the most densely populated areas in North America and the impacts to the environmental health of the watersheds and conservation lands are significant.

Conservation Authorities (CA) have an important role in the overall plan review process under the Planning Act, within the entire watersheds they oversee, and beyond the lands they directly manage. The TRCA, the largest of the conservation authorities, and other CA's land holdings have the potential to promote healthy active living, prevent disease and play a role in equalizing health conditions for people experiencing socioeconomic disadvantage. They are in an ideal position to support sustainable communities, which benefit greatly from being able to access a network of local and inter-regional trail and open space systems. There is a need to use all resources and all interventions in the service of health for the public as well as the environment.

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Natural environments have a restorative effect, act as stress buffers, and can help reduce the risk of illness associated with chronic stress<sup>(1, 2)</sup>. The experience of nature is a contributor to individual and community health and wellness through its positive effects on physical, mental and social health<sup>(1, 2)</sup>. Particularly important is engagement of those who are not already accessing nature and the outdoors as part of their daily life. Only one in five adults is currently getting the minimum weekly 150 minutes of moderate physical activity recommended by the *Canadian Physical Activity Guidelines* ([www.csep.ca](http://www.csep.ca)); less than one in ten children are getting the recommended activity levels of 60 minutes per day<sup>(3)</sup>. Access to nature is especially important to those experiencing poorer health outcomes, such as people with lower socio-economic status<sup>(4)</sup>. Individuals need not engage with nature to have their health impacted; natural spaces improve air quality by reducing particulate matter and decrease noise from high traffic areas<sup>(5)</sup>. Proximity to natural spaces has also been associated with healthier births<sup>(6, 7, 8)</sup>, reduced morbidity<sup>(9, 10)</sup>, and decreased stress<sup>(11, 12)</sup> and violence<sup>(13)</sup>.

As outlined on the Environmental Registry of Ontario posting, the stated objective is a proposal to “clearly define the core mandatory programs and services provided by conservation authorities to be natural hazard protection, conservation and management of conservation authority lands, drinking water source protection, and protection of the Lake Simcoe watershed”.

Given the very broad scope of Authority involvement particularly in urban and near urban areas, and the increasing recognition of not just health but also economic and tourism benefits of providing urban and near urban areas with access to nature we believe this proposal is too narrow.

- 1) We urge Government to consider broadening the proposed core mandatory programs and services of conservation authorities to include furthering the health and well-being of the population by fostering the ability of citizens and their communities to access and experience nature. This broadening should primarily focus on supporting environmentally compatible human use and education on those public lands owned or managed by conservation authorities.**

Given the importance of trails on conservation authority lands in supporting human health and providing economic and tourism benefits, as well as the fact that surveys indicate many of the trail users in the region of West Durham come from outside the Durham region, particularly from York Region and Toronto, it seems appropriate that some of the public funding shortfall alluded to in the sections below be covered by provincial funding from the health and tourism ministries, which have a related mandate.

The Province has many avenues beyond the Conservation Act for encouraging trails. The *Provincial Greenbelt Plan* goes into considerable detail in Section 3.3 on the importance of “maintaining and expanding the supply of publicly accessible parkland, open space and trails”. The *Moraine Plan* also calls for the establishment of a recreational trail system “to provide continuous access to travel along the entire Plan Area”. GDA has participated in the Provincial Plan review process throughout the years and made submissions which recommend changes to the *Provincial Growth, Greenbelt and Moraine Plans* aimed among other things at encouraging trail use. GDA has participated in a long dialogue over many years with the Province on the 3,000 – 4,000 acres of provincial land within Seaton that is slated for conservation and includes

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the Seaton Trail and other community trails. Future management of these lands seems to have reached a political impasse with the Region of Durham, the Province and the TRCA unable to reach agreement on how to handle the costs of administering these lands, if they are transferred to the TRCA.

The GDA has also been involved with the Province regarding 1,300 acres of provincially owned land in Uxbridge that the Province acquired more than a decade ago as part of the Seaton land exchange. More than 5 years ago the Province announced its intention to pass on responsibility for various parts of these lands to either Lake Simcoe or Toronto and Region Conservation Authorities. Although some negotiations have taken place, these lands which are very important from a trail/natural heritage point of view, still remain in limbo and no resolution has been reached with regard to future stewardship and use. Again the impasse seems to be around which government entity should cover the costs of stewardship for these lands.

- 2) We urge the Province to analyze and strongly consider taking action in the above mentioned areas by providing additional provincial funding to CAs, resolving cost sharing impasses between governments and CAs, and ensuring that in reviewing changes to existing provincial plans and policies there is increased support for trails.**

Our comments are based on our experience with funding levels in west Durham Region: in the east and west Duffins Headwaters areas, the Uxbridge Brook and other watersheds flowing north into Lake Simcoe. These areas have more than 200 km of trails, 8,000 acres of public conservation land in the Moraine portion of Uxbridge alone, and include sections of the Trans Canada and Oak Ridges Moraine trails (see Appendix A). TRCA surveys and trail counts completed in 2011 indicated the area attracts more than 100,000 trail visits annually; GDA members who are neighbors to these lands have observed significant user increases since the 2011 surveys were completed. Parking lots at trailhead access points for LSRCA and TRCA lands in our area are now full on many weekdays and often overflowing on weekends, and numbers of trail users are increasing yearly.

In 2017, 5,200 acres of Federal lands in North Pickering and Uxbridge were transferred to the Federal Rouge National Urban Park creating a nature trail corridor linking Lake Ontario, Toronto and urban areas in Durham to the Moraine in Uxbridge. This creates significant future economic and tourism opportunities, subject to obtaining further funding beyond Park boundaries. Better connections are needed to connect the Rouge National Urban Park to trails, nature corridors and communities in Uxbridge. It also reinforces the reality that many of the citizens who use our trails come, and will increasingly come, not from the Durham region but from nearby York and Toronto areas.

Last year GDA applied for a grant from the Ontario Trillium Foundation. GDA partnered with Parks Canada, TRCA, and ORTA, to develop a trail plan on a key piece of land owned and managed by the TRCA. A plan was required to establish connectivity to the Rouge National Urban Park and become the gateway to the trail system in Uxbridge. The new Rouge National Urban Park lies just to the south of this tract; a short walk to the west is a GO train station. This property has the potential to be a critical link for people to access hundreds of kilometres of trails.

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The current reality is that funding for conservation authority lands in this area does not acknowledge their valuable potential for the promotion of health. Trails require maintenance, signage, and a regular presence, all of which have been demonstrated to be important factors in encouraging people to make visits to natural areas as part of their regular activities <sup>(14, 15)</sup>. Investments in capital projects, ongoing maintenance costs, liability costs and staffing are required to fully realize the potential of these lands to improve the health of the population.

Over the past decade the GDA and its members have worked closely with CA's, municipalities and other partners in the development of an overall conservation and trail plan for the area and in negotiating additions to the conservation land base. GDA has also donated some \$2 million, through donations of land and partnerships through grants, primarily to support key land acquisitions but also to better maintain existing conservation land and trail systems.

The Oak Ridges Trail Association (ORTA) maintains many trails in this area and regularly leads hikes. Other user groups have also made significant contributions. The Durham Mountain Biking Association (DMBA) for example recently received a \$20,000 federal infrastructure grant, matched with \$23,000 of their own funds. More than six thousand hours of volunteer labor have built over 13 km of new mountain biking trails on TRCA lands; these along with existing trails attract biking enthusiasts from across the GTA.

The Province reduced funding to conservation authorities in the mid 1990's and the TRCA's municipal partners (Toronto, Peel, York and Durham) offset most of these cuts by providing annual capital funds. The TRCA advised GDA in 2016 that the budget dollars they would receive from Durham Region for the 3,587 hectare land holdings in Durham (apart from the 362 hectare Lake Ontario Waterfront lands which receive separate funding) was planned to be \$57,000. This is a completely inadequate amount for annually maintaining these 3,687 hectares of land and hundreds of kilometres of trails. This amount is also a small fraction of the amount per hectare York and Peel provide the TRCA for managing comparable lands in their jurisdictions.

The TRCA advised GDA that it was previously able meet its primary objectives for these Durham lands by drawing from budget sources outside Durham Region, and by receiving private support in Durham from the GDA and other concerned groups. The TRCA advised us in 2016 that these sources beyond Durham were no longer available. Unless additional public funds are made available it will not be possible to properly manage these lands and implement the recently approved Management Plans for them. This severe cutback of public support for conservation lands, at a time when the private interests have provided so much financial and volunteer support, is likely to send a message that private assistance does not benefit these lands. This risks making it increasingly difficult to enlist financial and volunteer support in future.

**3) We strongly encourage the Region and the Province to increase the level of financial assistance aimed at maintaining and enhancing public open space and trails.**

It has been Durham Region's past practice to contribute 40% of the cost of acquiring conservation lands. This has been much appreciated and has encouraged the raising of private funds that has enabled the TRCA with help from Ontario Heritage Trust, the GDA and many other contributors to acquire property in the Duffins Headwaters area that could not otherwise

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have been afforded. It would assist greatly if this program could be restructured to include not only land acquisition costs, but be expanded to also cover annual trail maintenance and enhancement costs. An annual cap could be placed on the level of maintenance/enhancement support to contain overall expenses.

The reality is that if Conservation Authorities cannot properly maintain and improve their existing lands and associated trail systems, public support and willingness to provide financial support will erode. These lands do not lend themselves to user pay approaches since there are many uncontrolled entry points and amenity services such as washrooms are not provided. We believe it would make far more sense to pursue public land and trail use expenses by encouraging an ever-larger donor base primarily of users who appreciate these lands when they are well looked after.

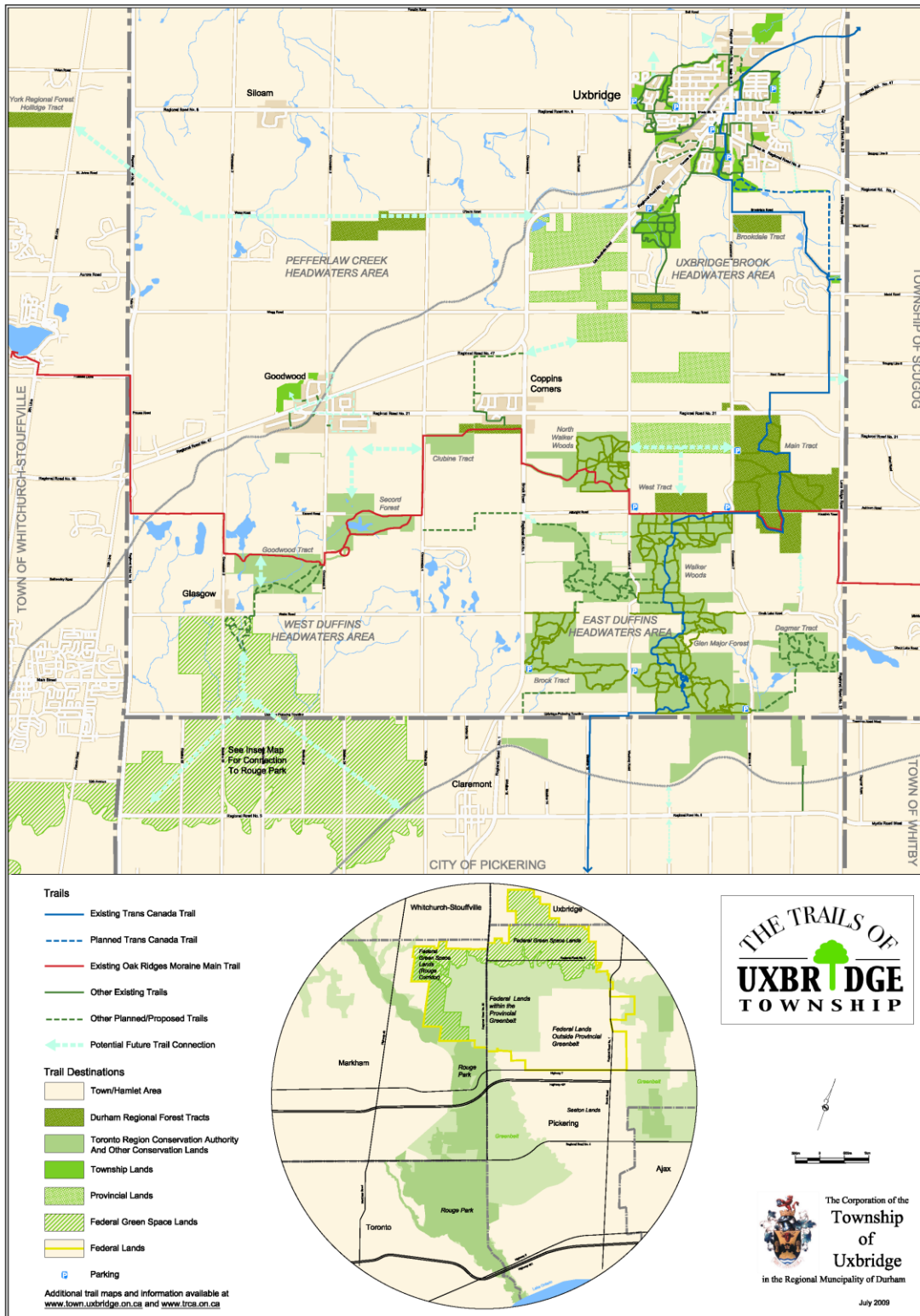
- 4) We urge Government to support the raising of private funds either by changing and expanding the existing regional program noted above so it is aimed at more than land acquisition, or by introducing a completely separate matching program to assist Conservation Authorities in increasing the funding available to maintain and care for public trails on their existing conservation lands.**

Respectfully submitted on behalf of Green Durham Association

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**APPENDIX A**





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