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Hon. Steve Clark, MPP

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**VIA email**

**RE: ERO #019-6216 Proposed Amendments to the Greenbelt Plan**

**ERO #019-6217 Proposed Amendments to the Greenbelt Area boundary regulation**

**ERO #019-6218 Proposed redesignation of land under the Oak Ridges Moraine Conservation Plan**

On behalf of Pickering Naturalists, I would like to state our unequivocal objection to the proposed amendments and boundary changes to the Greenbelt Plan, and the proposed redesignation of land under the Oak Ridges Moraine Conservation Plan. We find an overwhelming disregard for conservation issues in these proposals. Even the basic assumption that our provincial government would uphold minimal tenets of sound land-use planning must seemingly be cast aside in the rush to approve any and all development. This, regardless of the environmental cost to citizens and future generations. We utterly reject the contention that wetlands, the Greenbelt (including the Duffins Rouge Agricultural Preserve (DRAP), and lands in the Oak Ridges Moraine must have their protected status revoked in order to allow for additional housing to be built. We likewise reject the premise that “land swaps” are a reasonable approach to land-use planning. Sufficient lands are already available for housing, as we will address in our submission.

**About Pickering Naturalists**

Pickering Naturalists is a non-profit organization established in 1977 to provide a local natural history group in Pickering and Ajax (both formerly included in Pickering Township). Membership is open to anyone with an interest in nature. We have individual, family, student and life memberships. A club newsletter, Pickering Naturalist, is published quarterly. Regular outings to sites of interest are offered, both locally and farther afield. Our mission statement, as given on our website, is: encourage the enjoyment and study of nature and the environment; promote the conservation of our flora and fauna, land and water; and foster awareness and education of our natural surroundings. We have a long-standing involvement in conservation issues, dating from early participation in environmental planning for Frenchman’s Bay in 1978. It is from this focus on conservation that we have reviewed the aforementioned Environmental Registry Items.

**Summary of our concerns**

The provincial government has stated that the rationale behind their recent flurry of policy and law amendments is the requirement for additional land to meet housing needs. We find this claim to be totally unsubstantiated. According to Ontario’s Housing Affordability Task Force, 2022 report

<https://files.ontario.ca/mmah-housing-affordability-task-force-report-en-2022-02-07-v2.pdf>,

a shortage of land is not the cause of the housing shortage:

 “Land is available, both inside the existing built-up areas and on undeveloped land outside

greenbelts … Most of the solution must come densification. Greenbelts and other

environmentally sensitive areas must be protected, and farms provide food and security. Relying

too heavily on undeveloped land would whittle away too much of the already small share of land devoted to agriculture.” (pg. 10).

The amount of land now available for housing is far far greater than any requirements. According to an article in the Toronto Star [We cannot sprawl our way to housing affordability | The Star](https://www.thestar.com/opinion/contributors/2022/01/18/we-cannot-sprawl-our-way-to-housing-affordability.html)

(Jan. 18, 2022), “in the Golden Horseshoe … Municipal plans show that there are approximately

88,000 acres of land within urban boundaries across the region already approved for housing –

enough to meet Ontario’s needs for decades to come.”

We will also assess the government’s proposals regarding the Greenbelt, and review the many deficiencies in their approach. Our review will include a review of some of the specific sites targeted for removal from the Greenbelt, Greenbelt boundary changes, and redesignation of land under the Oak Ridges Moraine Conservation Plan. Finally, we will discuss our concern that other related submissions must be considered in conjunction with this present submission to fully address the relevant issues.

**Greenbelt**

Will the lasting legacy of the Ford government be the dismemberment of the Greenbelt? It is perhaps hard to believe that previous Conservative governments in Ontario have had a strong history of conservation initiatives. According to Burhard Mausberg, former CEO of the Greenbelt Foundation: [The Progressive Conservatives have a surprising legacy of conservation in Ontario. Here’s how Doug Ford can continue their success | The Star](https://www.thestar.com/opinion/contributors/2022/10/31/the-progressive-conservatives-have-a-surprising-legacy-of-conservation-in-ontario-heres-how-doug-ford-can-continue-their-success.html)

“The PCs were in power when [the Parks Act was introduced in 1913](https://www.ontarioparks.com/travel/background), with Algonquin Park already set aside 20 years earlier under the Liberals. And in the 1970s, then-premier [Bill Davis protected the Niagara Escarpment](https://www.thestar.com/business/opinion/2021/08/09/bland-works-former-ontario-premier-bill-davis-mastered-the-challenges-of-growing-the-province.html), which snakes through Ontario from Niagara Falls to Tobermory at the tip of the Bruce Peninsula. In 2001, [Mike Harris created the Oak Ridges Moraine Conservation Plan](https://www.greenbelt.ca/history). He previously protected [nearly six million acres](https://www.proquest.com/openview/1f2840d2f36b3ffda792f6b7ff4e8d98/) of other land, much of it new areas under the Ontario Parks umbrella.”

If the Ford government abandons their promise to “not touch the Greenbelt,” [Ford in 2018: 'We won't touch the Greenbelt' | CTV News](https://www.ctvnews.ca/video?clipId=2557879), they may well ruin the positive legacy of the party, a legacy that has persisted for over a century.

It is noteworthy that the chair and six members of Ontario’s Greenbelt Council resigned in 2020 following differences of opinion with the government. In a subsequent discussion relating to this issue, Premier Ford made the statement in 2020: We won’t build on the Greenbelt”:

[https://toronto.ctvnews.ca/ontario-to-cut-greenbelt-land-to-make-way-for-at-least-50-000-new-homes-1.6139646#](https://toronto.ctvnews.ca/ontario-to-cut-greenbelt-land-to-make-way-for-at-least-50-000-new-homes-1.6139646):

Shouldn’t integrity still count for something?

With reference to the purchase of properties by land developers that were formerly protected “in perpetuity” by the Greenbelt, and specifically the DRAP, Oshawa MPP Jennifer French asked: “Does the premier understand how shady this looks?”

[Much at risk in Ontario’s housing plan | The Star](https://www.thestar.com/opinion/editorials/2022/11/26/much-at-risk-in-ontarios-housing-plan.html)

The changeover of these protected areas in the Greenbelt, including the Duffins Rouge Agricultural Preserve in Pickering, is somewhat reminiscent of a scorched earth policy. Over the course of history, various regimes under attack have been forced to abandon tracts of land. As they retreat, they “scorch” the earth, and destroy anything of value, depriving their enemy of any benefit of the land, even food. This seems an apt description of the province’s approach to Greenbelt farmland. In the DRAP, the prime agricultural land will be paved-over / developed, and its agricultural potential lost. The rural landscape will be despoiled, and any wildlife habitat that remains will be highly degraded. By removing these lands from the Greenbelt, the government is essentially declaring that this land no longer needs to be preserved, so there is no harm in it being handed over to developers. In a “scorched earth” scenario such as this, the enemies of the government would be … the citizens of Ontario?

What possible motive could there be to preserve such land in the Greenbelt, when doing so would interfere with wealthy land developers making additional profits??

According to the Canadian Environmental Law Association (CELA):

“Although the ERO postings state that 15 areas of land will be removed, CELA believes the more accurate figure is 19. This was determined by examining the Redesignations or Removals Map 1 to 11 document attached to the ERO posting, available here:

<https://prod-environmental-registry.s3.amazonaws.com/2022-11/Redesignations%20or%20Removals%20Map%201%20to%2011.pdf>

A recent cartoon portrays the actions of the Ford government as “like a bull in a china shop”. But appearances can be deceiving. A bull would destroy things randomly, rather than with a Machiavellian focus to ensure that every single obstacle to its goal is smashed. A bull would not have a meticulous plan of attack, outflanking its opponents and demoralizing them with blatant misinformation – then overpowering them with the sheer magnitude of its assault. A bull would not have a horde of individuals under its control – individuals ordered to deconstruct the intricate system of regulations that safeguard the flora, fauna, endangered species, ecosystems, fragile irreplaceable habitats and prime agricultural lands – so that no shred of protection would survive intact.

**Specific Sites to be removed from the Greenbelt**

1. A band of protected farmland between Ajax and Whitby that connects the coastal wetlands and woodlands of Lynde Shores and a large block of woodlands and wetlands to the north along the former beach of glacial Lake Iroquois. I have spent a considerable amount of time exploring this habitat over the past several decades.

As an employee of the Central Lake Ontario Conservation Authority (CLOCA) for over a decade, I conducted natural history surveys and public tours of local conservation areas, including Lynde Shores C.A., on the Lake Ontario shoreline, and Heber Down C.A., on the glacial lake Iroquois shoreline. I collected and assembled natural history data on these sites. The woodlands and open areas here are irreplaceable as a vital connecting link for migrating birds moving northward from the shoreline in spring, and returning southward in fall. The Lake Iroquois shoreline itself is an important migratory route for raptors. Local naturalists have collected many years worth of data on the hawks, eagles, falcons and vultures that use this route, as a site related to the Cranberry Marsh Raptor Watch. [HawkCount](https://hawkcount.org/siteinfo.php?r=on&rsite=391&go=Go+To+Hawkwatch+Profile)

As an active birder and citizen scientist, I have submitted 9,000+ records to eBird, <https://ebird.org/> the provincial database, including a large number of sightings from these conservation areas and the local region. Data on birds for this area (and other sites) may be explored by visiting the website above. You will not find a single naturalist, ecologist, birder or outdoors-man/person who would think it is acceptable to sacrifice this precious resource in the name of urban sprawl. These lands are clearly identified in the Environmentally Sensitive Areas mapping done for CLOCA.

The wealth of natural history data collected on these lands is not limited to birds. The area has a rich herpetofauna, mammal diversity and insect fauna. Annual Butterfly counts by local entomologists, and summarized in annual reports by the Toronto Entomologists’ Association (TEA), have documented the diversity of species and large numbers of individuals present. [Ontario Insects](https://www.ontarioinsects.org/publications/lep_sum.html)

Our local naturalist club, Pickering Naturalists, and Durham Region Field Naturalists have had many public outings to visit these sites. We have also had public programs that explored the rich, sensitive habitats that exist along the shoreline of the former glacial lake. The public wants and deserves to see these important sites preserved, not sacrificed for private profit.

It is not sufficient to have islands of habitat, like conservation areas, with no connecting links between them. If we want our local wildlife, from White-tailed Deer to Red Bats, from Osprey to Ruby-throated Hummingbirds, from Monarchs to Harris’s Checkerspot, to thrive, we must have zones of natural habitat that connect these areas. Incidentally, Harris’s Checkerspot is just one of the significant species that inhabit this area. These wildlife corridors are essential.

1. Similarly, the natural corridor provided by the Duffins Rouge Agricultural Preserve (DRAP) provides a link for migratory species to move between the Lake Ontario shoreline, the shoreline of glacial Lake Iroquois and the Oak Ridges Moraine to the north. What public good is achieved by selling off agricultural land and rural areas that were supposed to have been protected “in perpetuity” so that they can be developed? The urban sprawl generated by this approach serves no-one, and with the climate change crisis on our doorstep, is a direct threat to our future.
2. The area shown on “Proposed Modifications Map 7”, a parcel of land located immediately north of Highway 401, immediately west of Lake Ridge Road, and south of Kingston Rd. This site includes an agricultural field to the north and a small but mature woodlot to the south. The woodlot includes a mix of evergreen and deciduous trees – offering habitats for a wider range of species than woodlots restricted to either type of tree. It includes mature maple, birch and spruce trees. The amount of woodlot in Ajax, and south Durham is rapidly dwindling. This site is included within the area covered by the Pickering Naturalists on our annual Christmas Bird Count, which we have conducted for the past 72 years. [Christmas Bird Count | Audubon](https://www.audubon.org/conservation/science/christmas-bird-count) I recall my brother and I covering nearby areas on brisk December days back in the 1970s, walking along hedgerows to find good birds like Ring-necked Pheasant. Those sites have long-since become completely suburbanized, the hedgerows vanished and the pheasants too.

In this rapidly urbanizing corridor, dissected by both an east-west transportation corridor of more than six lanes with Highway 401 and a north-south corridor of more than four lanes with Highway 412, every single bit of habitat is crucial. There is no such thing as “it’s too small to matter.” The proximity of the site to the north-south corridor of habitat along Lynde Creek to the east is also very important, as the valley provides a route for bird migration as well as other animals to move between the lakeshore and areas to the north, including the glacial lake Iroquois shoreline and the Oak ridges Moraine, farther north. The closeness to the extensive wildlife habitat of Lynde Shores conservation area is also an important consideration.

The significant area of prime farmland, so close to markets, offers an opportunity to support agriculture while minimizing the climate change considerations of long-distance transport.

If we shift our focus, from reasons that the government might wish to hand such sites over to developers for a quick buck – to reasons to keep them within the Greenbelt – then the obvious conclusion for any unbiased observer is to leave them in the Greenbelt.

**Additional Submissions re EROs, etc.**

1)In our extensive comments to the Standing Committee on Heritage, Infrastructure and Cultural Policy on Bill 39, Better Municipal Governance Act, 2022, we addressed issues related to the removal of the Duffins Rouge Agricultural Preserve (DRAP) from the Greenbelt. I have attached our comments for your review – see attached file: Pickering Naturalists Comments re Duffins Rouge Agricultural Preserve41.

2) Since some of the areas affected by these proposals are wetlands, or connected with wetlands,

including provincially significant wetlands, I have also attached our comments with regard to

proposed updates to the Ontario Wetland Evaluation System, ERO #019-6160 – see ERO

submission 2022 Nov 24 re Bill 23 and Wetlands 25 Final.

3) Proposed changes regarding conservation authorities (ERO #019-6141) will have a negative

synergistic effect in combination with the tsunami of proposed changes, including those to the Greenbelt, the Greenbelt boundary and the Oak Ridges Moraine. Likewise**,** ERO #019-6172 Proposed *Planning Act* and *Development Charges Act*, 1997 Changes; and ERO #019-6163 Proposed *Planning Act* and *City of Toronto Act* Changes will also be detrimental to the public good. Pickering Naturalists are in the process of drafting our response to these latter three ERO items, and will submit comments before the relevant deadline. We would ask that our comments on these items be considered along with the present submission.

**Conclusion and recommendation**

It is distressing that this whole exercise feels like a frontal assault on the system of environmental protections that we in Ontario have come to rely on. Since this entire Bill 23 House of Cards teeters precariously on the assumption that there is a shortage of land to meet housing needs – and there is demonstrably no such shortage – would it not be prudent for the government to issue a course correction? Our entire system of land use planning is based on an intricate network of checks and balances. We are intensely concerned that the biodiversity of Ontario will suffer drastic consequences as a result of these proposals. The changes proposed by the government will regress us back to square one and beyond – to the detriment of our society and ecosystems.

Pickering Naturalists urge you to not move forward with these proposed amendments to the Greenbelt Plan, the Greenbelt boundary, and the Oak Ridges Moraine Conservation Plan.

Yours in conservation,

Pickering Naturalists