



OAK RIDGES MORaine LAND TRUST

January 20, 2019

c/o Michael Helfinger
Intergovernmental Policy Coordination Unit
900 Bay Street, Hearst Block, 7th floor
Toronto, Ontario M6H 4L1

ERO # 013-4293 input on Bill 66, *Restoring Ontario's Competitiveness Act*

As Executive Director for the Oak Ridges Moraine Land Trust, I am writing to the Premier and Government of Ontario to ask that you keep your promise to protect the Greenbelt and Oak Ridges Moraine and reintroduce a new Bill 66 Schedule 10 that protects sensitive environmental lands such as forests, wetlands, natural areas and farmlands on the Greenbelt, Oak Ridges Moraine, Lake Simcoe region and in Source Water Protection Areas.

The Oak Ridges Moraine Land Trust was formed in 2000 by volunteers involved in the advocacy for the creation of the Oak Ridges Moraine Conservation Plan (ORMCP) under the Harris government with the support of MPP Steve Gilchrist. Steve Gilchrist is a valued past Board member of the Oak Ridges Moraine Land Trust from 2001-2011. Since 2000, the Oak Ridges Moraine Land Trust has worked with many levels of government to work within the land conservation framework and land-use planning in Ontario.

A stakeholder panel comprised of members of the development industry, environmental groups, scientists and politicians who reviewed and assessed the ORMCP was a successful element of the consultation and acceptance process. We respectfully suggest that a similar stakeholder panel with public consultations across Ontario should be incorporated as part of the consultation on Bill 66. Under the leadership of Former Mayor David Crombie, the Co-ordinated Review Advisory Panel *"encouraged the government to step up our efforts to curb sprawl, build complete communities, grow the Greenbelt, support agriculture and address traffic congestion. Their result is stronger plans that will help protect the quality of life for generations to come."*

Our concerns about Bill 66 Schedule 10 include the following:

- An Open for Business bylaw could be passed without public notice or meetings or right of appeal. Our communities across the Oak Ridges Moraine and Greenbelt have been active in the consultative process to establish local official plans.
- The tight timeline for comments during the holiday period does not allow sufficient time for understanding or consultation with the public.
- No background information is provided about the employment lands issue and why this problem can't be dealt within the current planning framework
- There is no information about the prescribed criteria which would be applied by the Ministry of Municipal Affairs.



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- Legal experts at Canadian Environmental Law Association (CELA) have indicated that once an Open For Business is approved that municipalities can't require adherence to the policies within the Clean Water Act, Oak Ridges Moraine Conservation Plan, The Greenbelt Plan and other local official plans. CELA has advised that "To do so would be unlawful under Bill 66."

Forests, wetlands, natural areas and farmlands provide healthy habitat for wildlife, sequester carbon, mitigate the effects of climate change, provide rural business and recreation opportunities and clean our air constantly and naturally. Farmlands, forests, water and natural areas disappear forever in urban sprawl.

Clean and abundant water is critical to both human and nature survival. Opening areas that have been protected for the safety of our drinking water to development threatens our environmental health, increases flooding, erosion and drought. Flooding and erosion events have caused significant increases in insurance claims resulting in hike in insurance fees.

Protected farmland supplies local food and enhances food security at a time when prices are rising and supplies from other countries are being threatened. Farming and our local food production are economically important and provide jobs to thousands. Urban sprawl into farmland destroys farm businesses and farming communities. The Land Trust protects both farmland and environmental lands across the ORM and Greenbelt and in the Lake Simcoe protection area.

Allowing the development of employment lands in the countryside, requires the expansion of infrastructure, roads, water and sewer servicing and will lead to higher property taxes for the people of impacted communities and all of Ontario. Provincial and municipal data show there is enough land already available in our towns and cities for our housing needs up to 2041. There is also a surplus of land for new businesses and we should be encouraging investment in these areas with strategic marketing not urban sprawl. By building within existing towns and cities throughout the Greater Golden Horseshoe, we can increase the supply of affordable housing and jobs in existing serviced communities while holding urban boundaries firm.

Please recall Bill 66 and consider the above impacts. The Oak Ridges Moraine Land Trust is ready to assist in any future consultations on this matter.

Respectfully submitted,

Susan Walmer, CPA, CMA

Executive Director, Oak Ridges Moraine Land Trust