



July 24, 2020

Ministry of Municipal Affairs and Housing
Office of the Minister
777 Bay Street, 17th Floor
Toronto ON M5G 2E5

Dear Minister Clark:

The following are comments that Six Nations of the Grand River are submitting in relation to the Proposed Amendment 1 to A Place to Grow (APTG) Growth Plan for the Greater Golden Horseshoe.

Six Nations of the Grand Rivers' Aboriginal and Treaty Rights throughout Southern Ontario are well documented through archaeological findings, historical facts and written Treaty Agreements. The Haldimand Treaty and the 1701 Fort Albany/Nanfan Treaty have been recognized in past court proceedings and are presented as factual evidence in the ongoing litigation from 1995 between Six Nations of the Grand River and the provincial and federal Crowns.

Six Nations is concerned about any development relating to air, land, water, wildlife, and resources which occur throughout their treaty territory and any archeological issues associated with such development(s). We have a responsibility as a Nation to ensure the protection of the natural environment so that future generations will have the ability to live in an environment where wildlife, aquatic life, birds and humans coexist in a sustainable manner.

Six Nations' territory is within the most highly urbanized land in Canada. Development has occurred on Six Nations' traditional territory without consultation or consent of our Nation. The cumulative effects of this intense development has contributed to significant environmental degradation and this is a very serious concern.

While we appreciate that your Ministry has taken the time to meet and consult with us, we would like to reiterate our position.

The most pressing concern we have in Proposed Amendment 1 is the change to the text of APTG to remove the prohibition on new mineral aggregate operations, wayside pits and quarries from habitats of endangered species.

As you are aware many of the known aggregate deposits are within our Treaty area. We cannot condone the continued disregard that the Ontario government has for the natural environment in favour of

appealing Ontario business owners. Sooner or later, we, are all going to have to take responsibility for the harms that have been done to our natural environment. We cannot continue to wantonly destroy the habitats of endangered species and species at risk.

We urge the Ministry to reconsider this particular amendment. The loss of elements of the natural environment should not be the cost of doing business in Ontario.

We do appreciate the inclusion of Policy 5.2.3.4 which includes stronger wording regarding Indigenous engagement, but we would also like to understand how this mechanism is proposed to be mediated should engagement between municipalities and Indigenous communities be unable to reach a mutually satisfactory conclusion. What recourse do Indigenous communities have should they feel that their concerns are not adequately being addressed?

We thank you for considering our concerns when making the decision regarding the proposed amendments to A Place to Grow.

Sincerely,



Lonny Bomberry,

Director, Lands and Resources,
Six Nation of the Grand River