

SUBMISSION TO THE ERO PROPOSALS TO CHANGE GREENBELT BOUNDARIES

<https://ero.ontario.ca/notice/019-6216>

This letter registers my **opposition to the current Ontario government's proposals to open the Greenbelt to housing**. My reasons are as follows and explained below:

- (1) Not all Greenbelt lands are of equal importance.
- (2) Ontario will need its Greenbelt lands as the planet warms.
- (3) Ontario needs a strategic plan for housing that reduces our car dependency, lessens our traffic gridlock, and avoids a future environmental and economic catastrophe.

1. Not All Greenbelt Lands are of Equal Importance

Just as organs such as the heart and the appendix are not of equal importance to human life, not all lands are of equal importance to the economic functioning of Ontario. The government's proposal to remove 14 critical parcels of Greenbelt land and replace them with lesser important land in the Paris Galt Moraine is a case in point.

Many Ontario politicians view our Greenbelt only as a place for our society to experience nature walks and fresh air. With that view, it is understandable that they are prioritizing housing over greenspace. But this is a mistake. They are failing to appreciate that preserving our Greenbelt is an existential issue. Natural Heritage Systems filter our water and protect our urban centres from flood damage. In fact, the very reason Ontario's conservation organizations were created was in response to the extensive flood damage caused by Hurricane Hazel in 1954.

The proposed land to be removed in the government's Greenbelt plan negatively impacts Ontario's Natural Heritage System. Most of the lands proposed for removal (10 of the 14 areas shown on the maps) overlap with the Natural Heritage System. As explained in the Greenbelt Plan, 2017 (3.2.1), the Natural Heritage System "provides a continuous and permanent land base necessary to support human and ecological health in the Greenbelt and beyond." These lands are vital to the ecological integrity of the Greenbelt and include "the highest concentration of the most sensitive and/or significant natural features and functions". These areas are to be "managed as a connected and integrated natural heritage system, given the functional inter-relationships between them". The proposal to remove lands from the Greenbelt's Natural Heritage System contravenes the intent of the Greenbelt Plan to protect Ontario's natural heritage.

Most of the lands to be removed are located on highly sensitive and ecologically important lands in the City of Pickering. This triangle of land at its widest point extends east-west for five kilometres between the Rouge River and Duffin Creek watersheds and stretches south to north for 7.8 kilometres from just north of Finch Avenue to Highway 407. This area supports thousands of acres of largely prime farmland, numerous valleys, woodlands, wetlands and the

entire critical headwater area of Petticoat Creek. These lands have major provincially designated wildlife corridors designed to provide east-west connections between the Rouge, Petticoat and Duffin Creek watersheds and north-south connections along the river valleys that connect Lake Ontario to the major east-west corridor of the Oak Ridges Moraine. The southern portion of this area also supports a highly sensitive band of wetlands and woodlands that is a recharge and discharge area on the former sandy beach of Glacial Lake Iroquois, a larger version of today's Lake Ontario.

Other important areas that are adversely affected include:

- A provincially designated wildlife corridor in King Township that provides a vital connection between the Holland Marsh and the Oak Ridges Moraine;
- A large wetland in Richmond Hill that is part of the provincially significant Rouge River Headwater Wetland Complex;
- A large provincially significant wetland in Clarington that is part of a sensitive groundwater recharge area;
- Large woodlots, wetlands and prime farmland in Hamilton along a sensitive headwater tributary of Big Creek;
- A large wildlife corridor in Markham at the sensitive headwaters for Robinson Creek, a tributary of the Rouge River, that supports a large cluster of provincially significant wetlands;
- Farmland in Hamilton and Grimsby designated as Niagara Peninsula Tender Fruit and Grape Area.
- 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;
- Critical wildlife corridors in Markham that connect the Oak Ridges Moraine to Rouge National Urban Park; and
- A valley of the East Humber River in Vaughan that supports the endangered redbreasted dace.

2. Ontario Will Need Its Greenbelt Lands as the Planet Warms

Globally, climate change is having a profound effect on the availability of drinking and agricultural water and this is putting at risk many of the world's sources of food. Experts predict that the Great Lakes Region may be a winner from global warming, but will need to step up to play a future role in saving humanity from starvation. While the agricultural land around Toronto is small compared to the size of Canada, it remains some of the most productive in the country.

Here are some examples of agricultural regions at risk due to the depletion of water:

- Farms Supplied by the Colorado River Basin

The Colorado River begins its journey in the Colorado and Wyoming Rockies and flows southwest through Utah, Arizona, Nevada, and California to finally discharge into the Gulf of California in Mexico. The snowpack of the mountains that feed the Colorado river is way down and the Colorado River basin is becoming permanently hotter and drier. This is putting major cities and some of the largest food producers in the United States at risk.

Lake Mead, the largest reservoir in the U.S., sits on the border of Nevada and Arizona and provides water to 25 million people, including Los Angeles, San Diego, Las Vegas and Phoenix as well as a massive area of farmland in Southern California and Mexico that produces much of North America's winter vegetables. Lake Mead's water level is down by 74% and is almost at "dead pool" status., i.e., where no more water will flow over the Hoover Dam that holds it.

- Farms of California's Central Valley

The Sierra Nevada mountains sit largely at the border of California and Nevada and provide 75% of California's drinking water. The snowpack of these mountains is down to 38% from historic levels. The farms that are watered by these mountains produce half of all US fruit, nuts, and vegetables. The drought has gotten so desperate that California has been informing entire towns that it can no longer supply them with any water.

- Cattle Farms of the US Midwest

This Ogallala Aquifer, the largest in the US, stretches from South Dakota to Central Texas and underpins 27% of all irrigated land in the US. This aquifer is being depleted so quickly that in 50 years, it is estimated that it will be down by 70%. If today we stopped water from being removed from this aquifer, it would still take 6,000 years of natural processes to refill it.

The water situation on the Ogallala is growing so desperate that a growing lobby has formed in the US to build canals to take water from the Great Lakes to the midwestern farms.

- Europe's Most Productive Agricultural Regions

The European drought in the summer of 2022, was the worst in 500 years. The UK reached its highest temperature ever and many of the main rivers of Europe were down considerably. The Po River, the longest in Italy, which is responsible for Italy's most productive agricultural region and for 40% of Italy's agriculture, went almost entirely dry. For the Po, the problem is that the snowpack from the Alps is disappearing.

- Lake Poyang, China

Lake Poyang, China's biggest freshwater lake, which feeds the Yangtze River, dropped to a historic low in 2022 with several reservoirs drying below "dead pool" status. The Yangtze River region is home to nearly 1/3 of China's 1.4 billion people.

- Farms Fed by the Himalayan Mountains

Glaciers from these mountains provide water to several of Asia's great river systems supplying India, China, Bangladesh, Pakistan, Afghanistan, Nepal, Bhutan, and Myanmar. Several percent of the entire Himalayan snowpack has disappeared as have 3 entire glaciers. The water from the snowpack of these mountains is responsible for the lives of 1.5 billion people.

- Africa and South America

The current drought in eastern Africa is the worst in its history leaving 16.7 million people in Ethiopia, Somalia, and Kenya facing food insecurity. In South America, the Andes have lost 30% of their glaciers leaving Peru with 50% less available farmland.

In October 2021, the US White House released its "**Report on The Impact of Climate Change on Migration**". In it, they anticipate that nearly "143 million people will be forced to move from their homes by 2050 due to climate change". Most of these refugees will move within their own countries but an accelerating number will leave for new countries, Canada being among them.

Parag Khan, CEO of Climate Alpha, and author of "**Move: The Forces Uprooting Us**" predicts that by 2050 "the best place to live on earth will be the Great Lakes". His assessment is echoed by Beth Gibbons, Executive Director of the American Society of Adaptation Professionals. She predicts the Great Lakes region could become a "climate haven" because of the region's unique mix of abundant water, protection from sea level rises, and a moderate climate in a world of global temperature rises. Investors are buying broad tracts of land in Michigan.

With many of the world's food-producing regions at risk, the Great Lakes Region, with 21% of the world's freshwater, may become one of the most important food-supplying regions in the world. This is why the loss of farmland in Ontario is alarming. According to the 2021 Canadian Census of Agriculture, the rate of farmland loss in Ontario has increased to 319 acres per day. From 2016 to 2021 the total acreage of farmland in Ontario decreased from 12,348,463 to 11,766,071. This rate of loss is almost double the 175 acres of farmland lost per day that was reported in the 2016 Census of Agriculture.

This loss of Ontario's farmland is hurting the Ontario economy. Over 860,000 Ontarians are employed by the agri-food sector based on our farmland. Additionally, our farmland provides habitat for species at risk and ecosystem services that will benefit the environment both now and for generations to come.

3. Ontario needs a strategic plan for housing that reduces our car dependency, lessens our traffic gridlock, and avoids a future environmental and economic catastrophe.

Ontario, particularly the Golden Horseshoe, remains one of the fastest-growing regions in Canada. But this growth must be managed. Prior to World War II, Toronto had an extensive network of streetcar systems that provided transit to a population housed in relatively dense neighbourhoods. After World War II, the city grew in a different manner, prioritizing single-family homes and a car-dependent culture. With it, the land required per person increased 5-fold.

While Toronto has made some progress in building high-speed transit options, what we have is still woefully inadequate compared to many cities, including ones in Canada like Montreal. This situation has left the vast majority of our population dependent on cars to get around, even to go to the grocery store. Even if people wanted to take transit, they simply can't because the transit does not take them where they need to go; nor does it take them to their destinations in the time they require. The result is that we have 4 times more cars on the road in Central Ontario (area = 39K sq km) than in comparable countries like The Netherlands (area = 41K sq km) with comparable populations.

This car-dependent culture is unsustainable. Highway 401 is routinely cited as having worse traffic than Los Angeles. In 2013, the CD Howe Institute put a number on the cost of gridlock to the GTA economy at \$11B. Since then, gridlock has only gotten worse (around \$25B in 2021) and in 25 years, after adding some 3 million people, traffic gridlock will possibly be costing us \$100 billion.

To sustain our economy, we need a different model – one which reduces the need for cars and which enables people to live, work and play on a transit grid, happily.

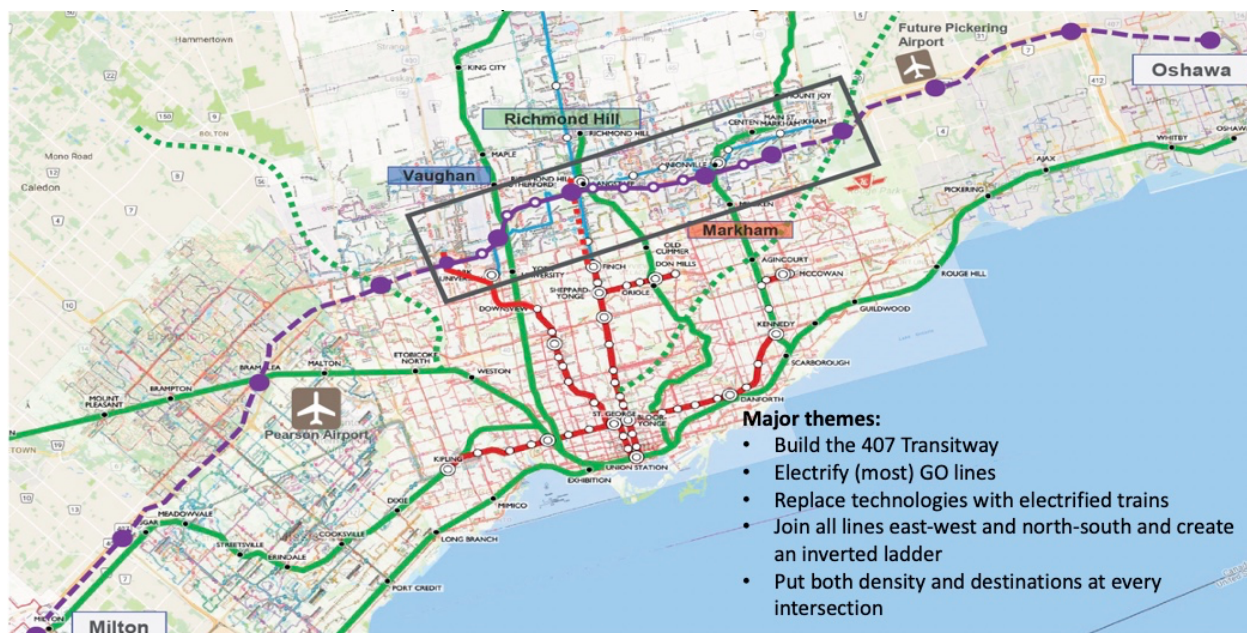
But this grid will require us to take a different approach to the development of our cities:

- The major elements of life – living, working, and playing – must be directly available on the transit grid.
- Transfers must be fast and seamless with little to no wait.
- The communities on the grid must be family-friendly. Today, most people believe that the only place they can raise kids is in single-family homes.

All of this points to building a different vision of the GTA than the one we are currently constructing:

- Focus on putting the population, and the places they want to go, on transit corridors.
- Dramatically increase the number and availability of transit corridors so that people can get anywhere they need to go.
- Integrate these transit corridors so that transfers are fast and seamless.

This set of imperatives points us away from building single-family homes and sprawl toward denser more community-based living.



It leads us to prioritize the following:

- Build the 407 Transitway beside the Highway 407 corridor from Oshawa to Milton.
- Modernize the GO Train lines to use smaller, more frequent, electrified vehicles and autonomous vehicle technology (as they are used in Vancouver).
- Build a selection of population centres along these corridors that focus on housing people at transit interchanges.

To pay for this project:

- Utilize Gas Insulated Line (GIL) technology to bury the hydro corridor. This technology is being used extensively in China and Germany, achieving economies of scale by building under train corridors.
- Make the land for the housing centres available to developers with prescribed designs for development to ensure maximum livability and maximum productivity in construction.
- There are some 50 centres that can be built between Milton and Oshawa each housing approx. 20K to 30K people (1 – 1.5 million people).
- Each centre could generate approximately \$1 billion in revenue providing about \$50 billion to pay for the train line and the burial of the hydro corridor.
- Between the centres, retain the area for parkland so that a 140km bike path can be built along the line joining all the centres. This would ensure livability for families. In these parkland centres, we can also put sports and other recreational facilities.
- Do the same thing on the GO lines and house another 1.5 million people.

Taking such an approach to our housing problems would:

- Provide comfortable housing for 1-3 million people.
- Enable economies of scale in the production of housing.
- Knit together a transit grid for the GTA that would help us avoid the economic destruction from traffic gridlock.
- Avoid the development of sprawl on the Greenbelt.
- Help Canada achieve its climate emissions goals.
- Not burden taxpayers with the cost of new transit.
- Unleash a multi-trillion economic development opportunity.
- Give Canada a showcase to the world in how to simultaneously address climate change and growth.

For these three reasons, I urge the Ontario government to abandon its plan to build housing on the Greenbelt and to choose a new, more productive, course.

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