



July 30, 2013

The Honourable Lisa Raitt
Minister of Transport
330 Sparks Street
Ottawa, ON K1A 0N5

Dear Minister Raitt,

I am writing on behalf of Green Durham Association, (GDA), a group of committed landowners and residents in the Durham Region. We are deeply involved in land use and conservation issues and wish to express our views on the recent announcement on the future of the federal lands in the Region.

We are pleased the Government of Canada is following through with its commitment to create the Rouge National Urban Park, and that Parks Canada has involved a broad range of stakeholders, including our organization, in the implementation process.

GDA believes that all federal lands in Durham Region not required for an airport should be permanently protected as food production and conservation lands.

Prior to the June 11th announcement identifying an 8,700-acre future airport site in the federal land holdings, GDA had operated under the assumption that any future airport site would fall outside the provincial Greenbelt. The site identified, however, not only includes 5,400 acres outside the Greenbelt, it also adds approximately 3,300 acres within the Greenbelt. The inclusion of this Class 1 farmland would appear to intrude into areas of provincial jurisdiction. We urge the federal government to work in partnership with the province and respect their plans and policies.

It is important to note that after the provincial government passed the Oak Ridges Moraine protection legislation in 2001, the federal government agreed to permanently protect 7,200 acres, including 5,500 acres on the Moraine. GDA was a member of the stakeholder advisory group appointed to advise on the strategy. The perception was that as airport plans were clarified, these protected federal lands would likely be further expanded. If instead, all federal lands in Durham are being slated for airport or economic development, less land in total will be committed to protection and previous commitments to protect some of the most sensitive land will be negated.

The total acreage outside the Greenbelt is more than sufficient to accommodate a major airport plus related commercial activity. We believe that even with some adjustments much more land will be deemed excess to airport use and therefore should also be permanently protected.

There was no mention in the announcement of the importance and economic benefit of maintaining these acres as food lands. The federal government's food land and environmental and passive recreation objectives for the Park would benefit greatly if these lands are permanently protected. Rather than being an isolated pocket surrounded by urban development, agricultural land in the park would be part of a much larger permanently protected agricultural land base extending east into Durham and south to include the Pickering Agricultural Preserve. This extensive land base would be large enough to encourage

investments in farm-based infrastructure and services critical to growing the food and farming cluster. According to the 2012 Golden Horseshoe Food and Farming Action Plan this cluster is currently one of the largest in North America, generating \$35 billion to Canada's economy when the multiplier effect is taken into account.

Properly protected and managed these Class 1 agricultural lands on the edge of the city would play an increasingly important role in protecting and supporting this sector of the economy. Permanent protection of these lands adjacent to the Park would also provide an essential environmental buffer and create a trail/natural area connection to the Moraine, something that cannot be created in the Park itself as its northern border abuts the Stouffville urban boundary.

GDA believes there are powerful economic and environmental reasons against proceeding with an airport before it is needed.

The most recent needs analysis was completed by the GTAA at Transport Canada's request in 2010. This study concluded that an airport at Pickering would not be needed until sometime between 2027 and 2037 and perhaps beyond. Transport Canada's own summary of this study indicates that if their 'pessimistic' forecast is used, and capacities at Hamilton and possibly Waterloo were enhanced, an additional airport wouldn't be required until 2039 to 2041.

The study underestimated the recession; projecting 2012 traffic levels at Pearson would be more than 10% higher than they actually turned out to be. We do not pretend to have any special insight into forecasting passenger volumes and airside capacity other than to point out any such forecasting can be wildly inaccurate.

Given the GTAA's apparent lack of interest in prematurely opening Pickering, it appears Transport Canada may turn to a consortium to build a larger version of Buttonville, regardless of the fact the GTAA study had concluded that Pickering was not required to handle corporate jet/general aviation traffic, for the foreseeable future even if Buttonville and other airports were closed.

We are confused by the announcement and the information provided at Transport Canada's open house. The public has received mixed messages regarding when it might be needed, little clarity around the type of airport that is being initially considered, no sense of who the entity might be who would be prepared to build it, or how it would be justified.

The announcement and subsequent radio interviews left the impression the federal government is not working closely with the province to identify transportation priorities, or give consideration to whether there are reasonable alternatives to accommodating corporate jet/general aviation traffic at existing airports as concluded in the GTAA study. Has consideration been given to whether development should first be directed to the province's adjacent employment lands in Seaton? We urge the federal government to ensure such a process is transparent and that it involves the province.

In summary, we urge Transport Canada to take the following steps:

1. Clarify the decision making process the government intends to pursue in planning for and making decisions on the federal lands. Before recent changes to the Federal Environmental Assessment Act an extensive arms-length review would have been required, with funding provided to interveners. This requirement should be adapted to the federal lands consultation process.
2. Commit to permanently protecting all the lands that are not needed for an airport, beginning with the acreage in the provincial Greenbelt and extended to additional Greenbelt lands as airport boundaries are finalized and further reduced.

3. Create a governance structure for these lands that best supports innovative, sustainable economically beneficial agricultural use, protects the ecology, and creates a natural area/trail link to the Oak Ridges Moraine.
4. Work with the Province to respect their Greenbelt and other policies.
5. Appoint a broad-based committee of stakeholders to advise on how best to manage the prime agricultural lands and natural areas to be permanently protected, including the Rouge National Urban Park officials in this process, and commit to involving the broader public. GDA would welcome the opportunity to be involved in this process.
6. Commit to building an airport on this Class 1 land **only** when/if there is a clearly demonstrated need and transparent, objective justification.
7. Use the possible airport site itself as food land **unless/until** a decision is made to begin to build an airport.

We look forward to further discussion on these issues.

Sincerely,

Michael Tucker
President, Green Durham Association
www.greendurham.ca

cc:

The Honourable Glen Murray, Ontario Minister of Infrastructure and Transportation
The Honourable Kathleen Wynne, Premier and Ontario Minister of Agriculture and Food
The Honourable James Flaherty, Minister of Finance
The Honourable Leona Aglukkaq, Minister of the Environment
The Honourable Chris Alexander, Minister of Citizenship and Immigration, Ajax-Pickering
Paul Calandra, Member of Parliament, Oak Ridges-Markham
Erin O'Toole, Member of Parliament, Durham
Perry Papadatos, Regional Manager, Pickering Site Operations, Transport Canada
Pamela Veinotte, Parks Canada, Rouge National Urban Park
Janet Horner, Executive Director, Greater Toronto Area Agricultural Action Committee