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Member of Parliament / Députée
Davenport



March 3, 2023

The Hon. S. Guilbeault
Minister of Environment and Climate Change

Via email

Minister Guilbeault:

Davenport residents have expressed great concern and opposition to the decision of the Ontario government to open parts of Ontario's Greenbelt for development.

I am also opposed, and I am writing to ask you to use every tool at your disposal to stop any part of the Ontario government's planned development of the Greenbelt.

The Greenbelt was created to protect environmentally sensitive lands. Its boundaries and size were explicitly defined to encompass a complete ecosystem that protects our drinking water, controls flooding, and provides food security, while preserving the biodiversity within.

I would like to point out four key problems with moving forward with the Greenbelt development:

1. Attack on existing environmental protections making Toronto's climate change plan impossible to achieve
2. Revert to urban sprawl - threatening agricultural and natural lands and undermining environmental protections
3. Do little for housing affordability - growth not linked to transit systems
4. Impact on Rouge Urban National Park - harm wildlife and natural ecosystems

Bill 23 dismantles many of the existing environmental protections in the region. The changes associated with the bill will create a process for selling off conservation lands without oversight; strip conservation authority powers which protect us from floods; and remove protections from woodlands, wetlands, and wildlife habitat

The Ontario government has been pushing urban areas in the Toronto region to expand their boundaries against the warnings of most planners, even though the Greater Toronto and Hamilton are currently sitting on 88,000 acres of undeveloped land within their pre-existing boundaries.

The Ontario government is ignoring this objective and is pushing for the expansion of the urban boundaries. Ontario Housing Affordability Task Force (Ford government commissioned) expressed very clearly that "a shortage of land isn't the cause of the problem." [1]

Not only were these moves unnecessary, but they also do nothing to help with housing affordability. As Phil Pothén, President of the Association of Municipalities of Ontario, stated:

“There is not the slightest hint of evidence or any reason to expect that bulldozing Greenbelt land will do anything to reduce the housing shortage, let alone home prices” [2]

The 4,950-acre *Duffins Rouge Agricultural Preserve* makes up the majority of the 7,400 acres being removed from the Greenbelt, while the *Preserve* contains some of the best farmland in North America. Parks Canada warned the provincial government that any change to the Greenbelt without consulting the federal government is in clear violation of the Rouge Park Agreement. [3]

There are at least three actions that the federal government can take:

- 1) Holding the Province to the Rouge Park Agreement
- 2) Applying the Species at Risk Act
- 3) Utilizing the Federal Impact Assessment Act

Climate change is accelerating more quickly than predicted and it is incumbent on us to do all we can to protect our ecosystems and biodiversity, while continuing to aggressively move to decarbonize our economy.

Climate change has no borders or boundaries, and every effort to protect our ecosystem is crucial to our survival.

As Davenport constituents have urged, it is our responsibility to use every tool at our disposal to stop Ontario from going backwards with the planned development of the Greenbelt.

I look forward to hearing from you.

My best regards,

A handwritten signature in black ink, appearing to read 'Julie Dzerowicz', written in a cursive style.

Julie Dzerowicz,
Member Parliament Davenport

Appendix – Additional Background & Context

In December 2023, the Ontario Ford Government—breaking a very clear promise—decided on dismantling a part of the Greenbelt.

In the same month, at COP15 in Montreal, the world agreed to a landmark biodiversity agreement. While Ontarians watched the coming together of a COP15 framework for boosting conservation that addressed biodiversity loss and ecosystem restoration, they might have felt a great sense of irony having just witnessed the partial dismantling in their own backyard of a successful model of the very idea Canada (via your efforts on behalf of our government) and the many nations had just fought so hard to establish.

The Ontario Government is hiding behind the mantra of “housing crisis” every time they are asked for the rationale behind the Greenbelt land deals and the equally troubling Bill 23. The land deals are problematic and lacking in transparency.

The deals have triggered investigations by both Ontario’s Integrity Commissioner and Auditor General [4]; are still open to the possibility of a criminal investigation by the Ontario Provincial Police [5]; and have received stiff opposition from citizens, municipalities, environmental groups, conservation authorities and farmers.

Indigenous chiefs and organizations across Ontario say that the Ontario Government has breached its legal and constitutional duty to consult them on issues affecting their rights and land. They have asked for the repeal of the Bill and are considering legal action. [6]

The following is additional information to the four key problems with the decision to open the Greenbelt for development as outlined in my letter above:

One- Attack on existing environmental protections

The Toronto Environmental Alliance warns that “It would make Toronto’s climate change plan impossible to achieve and would gut the Toronto Green Standard (TGS) which will seriously impact Toronto’s plans to reduce emissions from buildings which make up 61 per cent of Toronto’s carbon emissions.” [7]

The province treats Conservation Authorities as barriers to increasing housing supply and affordable housing, but the reality is they protect the watershed from environmental degradation and prevent development on floodplains—lessons that should have been learned after 1954 when Hurricane Hazel caused flooding catastrophes in the region.

At a time of the increased flooding due to climate change, the province deems it wise to reduce the protection of the region from flooding. This is alarming. And, flooding is expensive.

Minister Guilbeault, you mentioned the following in a past interview “The idea that the federal government will continue to compensate people where their provincial government deliberately allowed them to go and build housing units in an area that is prone to flooding is nonsense.” [8]

Two- Reverting to urban sprawl

The Greenbelt, beyond its environment protections, was also developed as a long-term plan to help control urban sprawl which threatened prime agricultural and natural lands, and the quality of life of the people in the Toronto region. The Greenbelt has proven to be the best way to respond to the sprawl, and therefore, preserve our ability to build livable communities.

Instead, the Ontario Government has shown a clear pattern of choosing to accelerate urban sprawl and undermine environmental protections. In November 2022, the province expanded the urban boundaries of the cities of Hamilton and Ottawa—without consultation, behind closed doors and explicitly against the wishes of both cities [9] [10]. The Province added 9,000 more acres in Durham [11], 5,400 acres in Hamilton [12] and 10,000 acres in Peel [13] – mostly on existing farmland.

The Ontario Government's own recent report from the Ontario Housing Affordability has stated: "Land is available, both inside the existing built-up areas and on undeveloped land outside greenbelts" and that "most of the solution must come from densification. Greenbelts and other environmentally sensitive areas must be protected". [14]

Not only did the province ignore its own task force by adding more land through urban boundary expansions, it then, unnecessarily, added another 7,400 acres of land by removing protected spaces from the Greenbelt. [15]

Three - Do little for housing affordability

Instead of denser development growth linked to existing investments in roads and transit, this kind of sprawl leads to more driving, longer commutes and congestion.

According to the province's own report from the Ontario Housing Affordability Task Force, "access to transit is linked to making housing more affordable: when reliable transit options are nearby, people can get to work more easily. They can live further from the centre of the city in less expensive areas without the added cost of car ownership". [16]

Four - Impact on Rouge Urban National Park

Duffins Rouge Agricultural Preserve had been set up with protections to keep it as farmland in perpetuity which is why the province sold the land decades ago at low prices to farmers while keeping all non-agricultural development rights to the Preserve in provincial hands.

The Preserve is right next to the Rouge Urban National Park (the largest urban park in North America). The preserve and the park together make up the last intact corridor between the lake and the Oak Ridges Moraine and any urbanization of the preserve threatens the park and nearby watersheds.

In December 2022, Parks Canada warned the provincial government that any development in the preserve will likely cause "irreversible harm to wildlife, natural ecosystems and agricultural landscapes within Rouge National Urban Park." [17]

What the Province of Ontario has done with the Greenbelt land deal and Bill 23 are not simple matters of political disagreement but is, instead, a fundamental dismantling of environmental protections with little to no discernible value for the public with a reminder that

the province's own task force made clear that a shortage of land isn't the cause of the housing problem.

After the Global Biodiversity Framework was adopted at COP15 that our federal government fought so hard for ... with you saying: "The Government of Canada demonstrated at COP15 that it understands what it takes to be a leader in the global fight to protect halt and reverse nature loss. The federal government must now translate the ambition and commitment it had on display on the international stage into concrete, meaningful action at home." [18]

There is no need to sacrifice the environment, biodiversity, and climate preparedness, destroy wetlands, our drinking water and the farmland that can help with food security, in order to provide housing. There is no need to continue developing in outdated ways that force people into longer, more expensive, and more CO2 emissive commutes.

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