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October 5, 2012

Andrew Campbell  
Office of the Director General  
Parks Canada  
25 Eddy Street  
Gatineau, Quebec K1A 0M5

Dear Mr. Campbell and the Parks Canada Rouge Park team,

Congratulations on a successful launch of the Rouge National Urban Park concept, meaningful engagement of key stakeholders, and outreach to residents of nearby communities and other interested parties over the summer through the public involvement phase of park development.

The Ontario Farmland Trust is grateful for the opportunity to attend information sessions and provide input over the past year, and we are very excited to see planning for this new park moving ahead, particularly given its uniqueness among Canadian National Parks and the emphasis on developing an entirely new park model. As an organization that has promoted farmland protection and encouraged a stronger commitment to conservation and agriculture on public lands in the GTA East area for many years, we are very pleased to see, from the start, a vision presented by Parks Canada for Rouge National Urban Park that supports, celebrates and promotes agriculture, and the protection and stewardship of farmland alongside the protection of natural areas.

The Ontario Farmland Trust Board of Directors has prepared several recommendations for Parks Canada that reinforce and build on the park concept presented, and embody feedback we have received from the farming community. Please find enclosed sixteen *Considerations for Development of the Rouge National Urban Park* that are top of mind for us as the initiative moves forward.

The Ontario Farmland Trust is a non-profit organization dedicated to protecting and preserving farmland and associated agricultural, natural and cultural features of Ontario's countryside. We pursue this through research, education, policy development and direct land securement. Our interests in the development of the Rouge National Urban Park, and recommendations to Parks Canada, therefore, relate directly to considerations for agriculture and farmland protection within the future park and impacts on adjacent agricultural lands.

One of the primary concerns of the Farmland Trust and our partners at this time is **resolution in management and governance of the federal lands in Durham Region adjacent to the proposed Rouge National Urban Park**. It is a great step forward to have federal lands in York Region committed to the new park, transfer of lands from Transport Canada to Parks Canada, and the protection of thousands of acres of Class 1-3 prime farmland for ongoing farming uses.

It is very important, however, for farming in the park to be connected to the larger farming community and have access to farm services (equipment dealers, farm input suppliers, etc.), rather than becoming isolated in the long-term. Already, urban areas surround the park to the west and north, introducing many challenges to the sustainability of farming. **To truly sustain a vibrant agricultural community within the park, it is critical that these lands remain connected to other prime farming areas to the east, through the Durham federal lands and beyond.**

Federal lands in Durham present an exceptional opportunity to affirm and expand commitment to conservation and farmland protection. While it is understood a portion of these federal lands may be required for a future airport and related developments, it appears the full 13,000+ acres in Durham will not be required. Surplus lands, such as those already designated as protected countryside through the provincial Greenbelt legislation or protected by the Oak Ridges Moraine Conservation Act, should be reserved for agriculture and conservation uses, and management and governance of these lands transferred from Transport Canada to an agency like Environment Canada that has the expertise required to effectively manage these lands for conservation.

Working with others in government, and in partnership with local groups like the Ontario Farmland Trust and the Oak Ridges Moraine Land Trust, **it is possible to cost-effectively and permanently protect federal lands in Durham Region for agriculture and conservation adjacent to the new park**. This will truly allow farming to be sustained and thrive within the National Park.

The proposed park concept does address other concerns about agricultural sustainability and farmland protection appropriately, such as recognizing the need to segregate out agricultural areas within the future park and buffer agriculture from other uses such as recreation. Parks Canada's interest in offering long-term leases to park farmers is also very encouraging, and leadership in this area could help set the stage for sustaining agriculture and farm stewardship on rented lands across the country. An ongoing desire to partner with the farming community and consult with agricultural leaseholders is also clearly stated and will be critical to the success of the park initiative.

We hope you find recommendations from the Ontario Farmland Trust insightful, and supportive of ongoing development of the Rouge National Urban Park. We look forward to further dialogue and collaboration in support of agricultural sustainability and farmland preservation as this exciting initiative unfolds.

Sincerely,

Norman Ragetlie  
Chair, Board of Directors

Matt Setzkorn  
Policy Coordinator

cc:

The Honourable Peter Kent, Minister of the Environment

The Honourable James M. Flaherty, Minister of Finance

The Honourable Denis Lebel, Minister of Transport, Infrastructure and Communities

The Honourable Rona Ambrose, Minister of Public Works and Government Services Canada

The Honourable Gerry Ritz, Minister of Agriculture and Agri-Food Canada



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## **Considerations for Development of a Rouge National Urban Park**

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- 1.) In creating this new national urban park model, recognize the unique opportunity to work alongside a diverse group of stakeholders, including farmers, and actively seek to engage these stakeholders in the planning process.
- 2.) Given the important agricultural land resources and significant natural heritage features within the future Rouge National Urban Park area, strive to create park objectives and guiding principles that value the protection of both prime agricultural soils and natural heritage features, and embrace farming activities within the park landscape. The park mandate should include preservation of a whole cultural landscape that sees agricultural heritage and modern farm stewardship celebrated.
- 3.) Farmers should be seen as key partners in park development and management, as ongoing stewards of park agricultural lands. Farm businesses and existing management of agricultural land should be seen as a strong asset in establishment of this new park.
- 4.) Seek to build synergies between conservation of farmland and preservation of natural heritage, and new opportunities for recreation and education (cultural heritage, local food, farming and the environment).
- 5.) Protect prime farmland, Canada Land Inventory soil classes 1-3, for its highest and best use: ongoing agricultural production. Acknowledge the national significance of this strategic land resource, given the limited amount of prime farmland in Canada and its ongoing loss to urbanization.
- 6.) Delineate agricultural areas separately from natural areas with clear boundaries in the park to avoid future conflict between agricultural and conservation goals. Also, provide reasonable protection of agricultural areas from potential trespassing associated with recreational uses. Areas designated for agriculture through park planning should include all areas currently being farmed.
- 7.) Permanent agricultural areas, as delineated, should be suitably defined in mapping and be included within legislation for the new park.
- 8.) Naturalization of prime farmlands and tree planting within designated agricultural areas should be limited, to ensure protection of prime agricultural soils and sustain farming activities on the land.
- 9.) Wherever possible, existing farm tenancies should be permitted to continue within the park area.
- 10.) The new park should not limit size or types of farming operations permitted within delineated agricultural areas, recognizing that farm size and type of production depends

largely on changing food demands and global commodity markets. Agricultural businesses are constantly evolving and park policies should not put undue restriction on farm size, type or production practices.

- 11.) Emphasize and encourage innovation in sustainable land use and sustainable farm livelihoods, and work with the farm community to define any sustainability parameters or land use restrictions related to agricultural activities within the park. Engaging farmers in the Environmental Farm Plan process presents a strong foundation for environmental stewardship.
- 12.) Long-term farm leases need to be established with farming tenants, which allow farmers to make substantial investments in land stewardship and their farm businesses, building equity (eg. 60-99 year agreements offered through the Cuyahoga Valley National Park model in the United States).
- 13.) To encourage greater investment from farmers and to limit park expense associated with managing leases and tenants, consider creative partnerships or alternative land ownership arrangements (eg. sale of farm properties to private ownership subject to farmland conservation easements, which would be held by a conservation body such as a land trust or conservation authority and backed by Parks Canada).
- 14.) Consider supporting the creation of an arms-length not-for-profit organization that acts as a liaison between Parks Canada and farm tenants. This organization could provide technical information and guidance to Parks Canada in developing farm lease agreements and advising staff about sustainable farm practices, support and strengthen relationships with tenants, and promote agriculture in the park through local food and farmers' markets, farm education programs, etc. (eg. the Countryside Conservancy partnership with the Cuyahoga Valley National Park in the United States).
- 15.) Recognize that farmlands and farm infrastructure (farm equipment dealers, farm input suppliers, etc.) adjacent to park boundaries must be protected and maintained. A critical mass of farms and supporting farm businesses adjacent to the park will help to ensure agriculture remains viable within the park. Federally-held Transport Canada lands in Durham Region surplus to what is required for a future airport and related developments should be protected for agriculture and conservation.
- 16.) Attempt to resolve all land use, governance and management issues associated with all federally-owned lands within the GTA East area as expeditiously as possible, including the portion of the federal Pickering Airport Lands in Durham Region (Transport Canada) surplus to what may be needed for future airport developments.
  - a. Consider establishing a Stakeholder Advisory Group that can make recommendations about new governance and land ownership structures, management of lands and tenancies, agricultural and natural heritage planning, etc.
  - b. Attempt to expedite coordination of a land use plan that includes the Rouge National Urban Park and the current Transport Canada lands.
  - c. Preserve all surplus airport lands for agriculture and conservation, providing connectivity between farming areas with the Rouge National Urban Park, York Region and Durham Region, as well as connectivity between natural areas from Lake Ontario through the Rouge Valley to headwaters on the Oak Ridges Moraine.
  - d. Acknowledge existing provincial land use designations established through the Oak Ridges Moraine and Greenbelt legislation, which prioritize conservation on surplus

Transport Canada airport lands. Consider using the Greenbelt boundary as a defining line between lands reserved for conservation and lands remaining available for a potential airport and related developments in the future. Also, respect commitments made by the federal government to protect lands identified in Transport Canada's 2003 Greenspace Master Plan.

- e. Consider all ownership and management options for these surplus lands, and determine the best and most feasible means to achieving agricultural and conservation objectives. Options may include:
  - i. Inclusion of all surplus airport lands within the new Rouge National Urban Park.
  - ii. Sale of property to private ownership subject to farmland conservation easements, which would be held by a conservation body such as a land trust or conservation authority, and backed by Environment Canada, in a way that upholds the government's conservation objectives.
  - iii. Transfer of lands and management responsibility from Transport Canada to Environment Canada. Administration may be supported by local conservation bodies, such as land trusts or conservation authorities. There would also be advantages to bringing all conservation lands under one governance structure.
  - iv. Establish a new federal entity or quasi-independent organization with its own Board of Directors, mission and management responsibilities dedicated to sustaining agriculture and protecting natural heritage, working with local stakeholders.
  - v. Establish an arms-length non-profit organization that acts as a liaison between the federal government and farm tenants and supports equitable planning and policy development for agriculture, helps craft long-term lease agreements and encourages private investment in land stewardship and agriculture on federal lands.
  - vi. A combination of the above options (eg. some land to be included in the park and some lands placed under easement, creating a Rouge National Urban Park and an adjacent Agricultural Preserve).