



*c/o University of Guelph, School of Environmental Design & Rural Development, Guelph, ON N1G 2W1
(519) 824-4120 ext. 52654 | fax (519) 767-1686 | info@ontariofarmlandtrust.ca*

July 25, 2013

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

Dear Minister Raitt,

RE: Responsible Use and Management of the Federal Pickering Airport Lands

Thank you for the opportunity to respond to the Government of Canada's new plan for the Pickering Lands and to provide input on the future uses and management of these lands. The Ontario Farmland Trust (OFT) is pleased to see planning for these lands moving forward, and commends the Government of Canada for its commitment to creating the Rouge National Urban Park. It is heartening to have 5,000 acres of farmland permanently protected as part of the park, and see greater support being provided for the area's farm community through this unique, new national park model.

We do have some outstanding concerns, however, regarding stakeholder consultation in further planning for the future of the Pickering Lands, ongoing uncertainty about the future of lands left undesignated in the plan, and effective management of the site in the long-term. Outlined below are recommendations on how Transport Canada can address these concerns.

OFT has a strong interest in working with Transport Canada, and other local conservation partners, to protect and manage agricultural and natural lands on the Pickering site that are surplus to lands reserved for future airport purposes. OFT is a federally-registered non-profit organization dedicated to protecting and preserving farmland and associated agricultural, natural and cultural features of Ontario's countryside. We pursue this with a variety of landowners and through strong partnerships with all levels of government, farmers and farm organizations, conservation authorities and other land trusts. We support land use planning and policy development for farmland conservation, and work on-the-ground with property owners to manage lands and enter into farmland conservation easement agreements to ensure land is protected in perpetuity for agricultural purposes.

Future Use of Lands Surplus to Airport Purposes & Harmonization with Provincial Interests

OFT shares the concern of many other farm and conservation groups about the lack of clarity from Transport Canada about the future use of portions of the Pickering Lands that have been left undesignated and outside the identified airport lands and the national park commitment in Markham. We believe that it is in the best

public interest to extend a commitment to preserve all farmlands that are surplus to what is needed for a future airport. Such a commitment would help sustain agriculture in the Rouge National Urban Park and would be better aligned with provincial interest in protecting portions of the site that are part of the Greater Golden Horseshoe Greenbelt. It would also be consistent with previous federal Greenspace commitments to preserve sensitive agricultural lands and environmental features of the Oak Ridges Moraine along the northern boundary of the site.

Planning for the future of surplus lands on the Pickering Site needs to be closely integrated with current planning for the national park. Currently there is the risk that farmers in the park will become isolated in the long-term and surrounded by urban development. Land has already been urbanized along the entire western boundary of the park, requiring farms in the park to be buffered from conflicts associated with trespassing, vandalism, theft, etc. To retain thriving, vibrant farms in the park, it is important for them to be connected to a larger farming community as well as critical farm infrastructure and agricultural services. Making a commitment to extending permanent protection to adjacent farmlands to the east of the park through the Pickering site would give more certainty to farmers within and outside the park, and allow them to plan for the future of their businesses and make substantial investments in land stewardship and farm infrastructure.

In 2001, Transport Canada announced that approximately 7,500 acres of the Pickering site would become permanent green space, and a federally-commissioned Green Space Master Plan identified prime agricultural areas and areas of the Oak Ridges Moraine for permanent protection. The perception then was that as airport plans were clarified, these protected federal Green Space lands would be further expanded. Unfortunately, this ultimate Green Space protection was never fully delivered. The new Rouge National Urban Park will protect a portion of these Green Space lands, but the complete commitment to protect Oak Ridges Moraine lands has not yet been fulfilled. It is concerning to see designated airport lands in the new mapping encroaching onto the sensitive Oak Ridges Moraine and negating previous federal Green Space preservation commitments.

In 2005, the Province created a protected Greenbelt area across the Ontario's Greater Golden Horseshoe region, reinforcing the public desire to see stronger protection for farmland and green space. The Greenbelt policy area designates a portion of the Pickering Lands Site in Durham as 'Protected Countryside.' This includes the majority of lands left undesignated in the new Picking Lands plans and mapping from Transport Canada.

At 8,700 acres, the newly identified airport site remains twice the size of Toronto's Pearson International Airport – significantly larger than what is needed for any future airport. At the June Transport Canada public information sessions, we were told that a larger site was chosen since an actual airport layout had yet to be finalized. This indicates that there may be additional lands surplus to airport purposes within this area as well, once the airport layout is finalized. Any lands within the identified airport site surplus to what is needed for airport purposes should also be protected for agriculture and conservation uses over time.

OFT strongly encourages Transport Canada to direct airport developments to lands falling outside the provincial Greenbelt policy area and to the east of the West Duffins creek, as is consistent with preferred airport layouts previously considered by the Greater Toronto Airports Authority. It is also important to ensure any development on the Pickering Lands is restricted to an airport and specific airport-related uses only, as is consistent with Transport Canada's mandate. Identified airport lands should continue to be used for agricultural purposes until any development begins.

In planning for the future use of surplus lands, we recommend that Transport Canada build on previous work completed through the 2001 Green Space Master Plan; recognize provincial Greenbelt designations and prioritize protection of farmland and natural features in this area; and work closely with Parks Canada to

harmonize planning on lands adjacent to the new national park to ensure coordination and support for the park's environmental protection and sustainable agriculture objectives. Agriculture and conservation activities are highly compatible adjacent land uses to an airport, and such uses should receive greater protection, and be encouraged as part of long-term planning for the site.

Forming a Stakeholder Advisory Group & Formalizing a Commitment to Public Engagement

It is important that the Government of Canada work collaboratively with the Province and local farm and conservation groups to coordinate planning for the future land uses and management of the entire Picking Lands site. Transport Canada should lead ongoing and meaningful stakeholder consultation by organizing regular public meetings and forming a core Stakeholder Advisory Group with representation from all federal departments involved, including Environment Canada/Parks Canada; the province; local municipalities; the conservation authority; local land trusts and farm groups.

Similar to Transport Canada's Green Space Stewardship Advisory Committee, convened to create the Green Space Master Plan in 2001, a new Stakeholder Advisory Group will generate considerable support for Transport Canada's planning processes. The Group will make recommendations on new governance and land ownership structures, management of lands and tenancies, and broader agricultural and conservation planning. With the right stakeholders around the table, the Group will enable Transport Canada to adequately respond to local sensitivities, identify the best approaches to protecting and managing surplus lands, and generate community buy-in. The Ontario Farmland Trust is very interested in being part of such a group.

Effective Management of Pickering Lands & Involvement of Land Trusts

Since expropriation for the airport in 1972, the Pickering Lands have suffered from neglect. Farmers continue to struggle with the uncertainty inherent in short-term leases, and are therefore limited in how much investment they can justify in land stewardship and their businesses on the Pickering site. Agricultural lands remain underutilized, and costs of managing these lands have been an ongoing burden on Canadian taxpayers.

Currently, site management policy for the PLS is established by Transport Canada, with administration left largely to Public Works and Government Services. Unfortunately, this arrangement does not include a thorough understanding of agriculture and ecology. Lack of expertise in these areas, combined with absence of staff working on-the-ground with farming tenants and conservationists has led to scattered and incomplete efforts to restore natural heritage and encourage innovation in agriculture.

Parks Canada has made great strides forward in planning for the management of Rouge National Urban Park lands, presenting opportunities to rebuild farm infrastructure and attract new investment in local food and farming in the park area. Similar opportunities should be presented on surplus lands in Durham Region. As indicated above, creation of a Stakeholder Advisory Group is a necessary first step to resolving decades-long neglect and addressing management challenges.

Land trusts can have an important role in supporting the Government of Canada's goals for the Pickering site by working together to cost-effectively and permanently protect surplus agricultural and conservation lands. The Ontario Farmland Trust and the Oak Ridges Moraine Land Trust (ORMLT) are already active in the area and well suited to partner on land conservation on the Pickering site, given OFT's experience protecting agricultural lands and ORMLT's mandate to protect moraine lands.

Drawing on expertise in building partnerships with local governments and conservation authorities, as well as working directly with communities and private landowners on land preservation and stewardship, OFT and ORMLT are uniquely positioned to collaborate with Transport Canada in reviving conservation efforts on the Pickering site and supporting agricultural activities in the area. Both OFT and ORMLT are approved by Environment Canada as designated recipients of land donations and property rights through the Ecological Gifts Program.

OFT and ORMLT have a strong history of cooperation, particularly around the use of conservation easements with private and government landowners. In addition to pursuing longer-term leases with farmers, conservation easements present an opportunity on the Pickering Site where it may be appropriate over time to return some lands to private ownership. Easements can be placed on these lands prior to sale to ensure agricultural and environmental objectives are still maintained. This would generate revenue to support the management of the Pickering Lands and encourage innovation and redevelopment of the local farm economy, in addition to preserving key farmlands.

Ultimately, significant changes need to be made to the treatment and management of surplus agricultural and natural lands. Transport Canada alone is not the appropriate management body for such lands and alternative options must be explored. A new structure and management entity is needed for these lands, with ongoing support from the Stakeholder Advisory Group. It is important to ensure that management responsibility is held with a body that has an explicit mandate to support agriculture and land conservation, has experience working with farmers and other landowners, and is buffered from any future shifts in political priorities.

Importance of Agriculture and Farmland Preservation in the Region

The Pickering Lands contain some of the highest quality, Class 1 agricultural soils in all of Canada; 50% of Canada's Class one land is located in southern Ontario. Since the Pickering Lands were expropriated 40 years ago, the Greater Golden Horseshoe area has seen over 350,000 acres of farmland lost to urbanization, with a large portion of those lands being irreplaceable Class 1 soil. This rate of loss is unsustainable and a poor legacy to leave for future generations, undermining the important regional and provincial food and farming economy.

Ontario's Golden Horseshoe area contains one of the largest food and farming clusters in North America, with \$1.5 billion generated annually from farm receipts, and over \$12.3 billion when the food processing sector is added. This generates \$35 billion annually to Canada's economy in spin-off economic activity (Golden Horseshoe Agriculture & Agri-Food Strategy, Food & Farming: An Action Plan 2021, Greater Toronto Area Agricultural Action Committee, 2012). Success of the food and farming sectors in this region is largely due to rich agricultural land resources – dwindling resources that need greater protection. Population growth, worldwide depletion of prime agricultural land, rising energy costs and food security concerns all point to the necessity of protecting local farmlands and making local food production a priority.

Preserving farmlands, and associated forests wetlands and valley lands, on the Pickering Site is essential to maintaining and improving quality of life in the Greater Toronto Area. Within 100 kilometers of 20 percent of Canada's population, the Pickering Lands offer an unprecedented opportunity to protect farmland in the GTA in a way that enables millions of people to connect with local food. It is also an unprecedented opportunity for the Government of Canada to demonstrate leadership in conservation and long-term sustainability planning.

In Summary

As planning for the Pickering Lands commences, the Ontario Farmland Trust recommends that Transport Canada:

- Recognize the economic, ecological and food-producing importance of prime farmlands located on the Pickering site, and their significance in regional, provincial and national contexts;
- Commit to the permanent protection of all farm and conservation lands surplus to what may be needed for a future airport and the Rouge National Urban Park – lands identified now, and additional surplus lands within the airport reserve area when the airport layout is finalized;
- Build on the 2001 Green Space planning protections developed for the Oak Ridges Moraine, and harmonize planning with provincial Greenbelt protections for farmland;
- Work closely with Parks Canada to coordinate planning for the protection of agriculture and farmlands adjacent to the Rouge National Urban Park;
- Ensure any development of the Pickering Lands is restricted to airport and airport-related uses only;
- Clarify the process for planning and decision-making regarding the Pickering Lands through transparent and regular public meetings;
- Convene a Stakeholder Advisory Group of government representatives, farmers and conservation groups, including land trusts;
- Work with stakeholders to develop new management structures for stewardship of surplus lands, including a new body or organization with experience in agriculture and conservation, and a commitment to protecting farmland and supporting farming activities.

Thank you again for the opportunity to provide input during this early planning phase for the future use and management of the Pickering Lands.

The Ontario Farmland Trust is prepared to work alongside Transport Canada, and other farm and conservation partners, to share expertise and help achieve permanent protection of farmland and agriculture on surplus lands. We look forward to further conversation about opportunities for collaboration with the Government of Canada in support of this collective objective.

Sincerely,



Norman Ragetlie
Chair, Ontario Farmland Trust

cc:

Perry Papadatos, Regional Manager, Pickering Site Operations, Transport Canada
The Honourable Glen Murray, Ontario Minister of Infrastructure and Transportation
The Honourable Kathleen Wynne, 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, Member of Parliament, Ajax-Pickering
Paul Calandra, Member of Parliament, Oak Ridges-Markham
Pamela Veinotte, Parks Canada, Rouge National Urban Park
Patricia Short-Galle, President, Oak Ridges Moraine Land Trust
Janet Horner, Executive Director, Greater Toronto Area Agricultural Action Committee