Former Pickering Airport lands consultations

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To: Transport Canada

Re: Consultation – Future Uses of the Pickering Lands

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1. THREE THANK YOUS. First, my thanks to Transport Canada and the federal government for holding consultations with the public on the future of the former Pickering Airport lands.

Plus, a second thank you for cancelling plans for the proposed airport in north-central Pickering in January 2025. It was first announced more than 50 years ago, and its necessity became more difficult to justify as every year passed.

Lastly, a personal thank you for taking written submissions. I missed the public sessions on March 11th and 12th and would have attended but only found out on the 13th! These are my comments.

2. ACTIVITY GALORE IN EAST MARKHAM AND NORTH-CENTRAL PICKERING. The area is experiencing three major studies of interest to the public at the same time and there are clear links between them. The first is for the widening of Highway #7, and the second is for ALTO. The Pickering Lands is the third. An understanding among the three is needed before any of them commences implementation. Public consultations, most certainly, but implementation, not so fast.

3. ROUGE NATIONAL URBAN PARK. There's a fourth major player. It's already in place – RNUP, one of Canada's great environmental initiatives of the 21st century. The concept has huge potential elsewhere in Canada, but it's a work in progress and will be for some time. Taking into consideration the reasons for RNUP's existence, and the plans it has been implementing since its birth in 2015 or just beginning to consider, none of the three studies can reach the level of success each proponent anticipates without the park's participation and agreement, or at least acquiescence. Each study will be a major test of the meaning of "Urban" in the park's name and will measure the respect other federal agencies, the province and nearby municipalities give RNUP when it truly counts. The dialogue concerning the park should be in public view; citizens deserve to know details and have their comments sought. Interesting, it will also be a test of Parks Canada as this relatively new type of park deals for the first time with its urban neighbour's needs for new and significant infrastructure.

4. STUDIES ONE AND TWO. Below are summaries of the comments I submitted on the first two. The full documents are attached.

Widening Highway #7. A provincial Environmental Assessment under the Ministry of Transportation to widen #7 to four lanes between Donald Cousens Parkway in east Markam to Brock Road in Pickering is underway. It started last fall. This improvement is long overdue. For a significant stretch, #7 is the southern boundary of the Pickering Lands.

My main recommendation was that the priority should be widening Steeles Avenue between Taunton Road in the east and Markham Road in the west. It carries considerable traffic. It's not a provincial highway but a Toronto arterial. I went on to say that if widening #7 was going to happen, and it surely is, a bypass to

the north of the hamlets of Locust Hill and Green River should be included. Next to mandatory. It would be in the park.

Running a widened road through the hamlets would destroy them and show disrespect for our rural heritage. Bypasses for such purposes can be found all over the province in both urban and rural settings. Rouge National Urban Park and its neighbours have an agreement, the Landholder's Agreement (some of its principles are in the RNUP Act), which protects access to federal, provincial and municipal infrastructure in place before the park's arrival and lays out a formula for projects needed in the future. It will come into play here and with ALTO. Both cross RNUP. But it should be a two-way street; the parties should ensure that each project brings as much benefit to the park as possible.

Preparing for ALTO. On the federal side, Transport Canada is also consulting with the public on options for the recently announced high-speed rail (HSR) connecting Quebec City, Montreal, Ottawa and Toronto – exact routes, station locations, etc. Also a much needed project, commendable but challenging. I made a submission which contained two closely-related recommendations which could impact plans for the Pickering Lands.

Add a Station in East Markham or West-Pickering. ALTO's initial recommendation was for three stations in Ontario – Ottawa, Peterborough and Toronto (presumably Union downtown). Our province clearly needs up to three more stops. One raised voice is for east suburban GTA; it would have a catch-basin of Scarborough, Markham and Durham – that's 1.5 million people. The Yonge subway extension should open in Richmond Hill by 2033 (or so!) for people living in the central GTA. But very few potential passengers to the east will want to first travel to downtown Toronto to then catch ALTO going east to Ottawa and Montreal. They will have one simple word for that, "Stupid." I recommended that the station be located where the new 4-lane Highway #7 bypass of Locust Hill and Green River crosses the CPKC (Canadian Pacific Kansas City) Havelock Line.

Follow the existing CPKC Havelock route from Pickering into Toronto. When one looks at the GTA, there are few obvious routes available for the HSR to reach Union Station and, at the same time, maintain speed. ALTO anticipates an average of 175 to 225 km/hour from Toronto to Quebec City. That wouldn't be possible on the crowded lakeshore line – and ALTO wisely wants to avoid it. The plan is for it to have its own corridor from Peterborough to Toronto. But closer to the GTA, the only access seems to be the already-existing Havelock route. Presently underutilized is an understatement. My recommendation? Pick up this corridor from about the Pickering Lands and follow it through east Markham into Scarborough and downtown. Likely elevated at some point.

5. SEVEN QUESTIONS RELATING TO THE PICKERING LANDS. This initiative needs to consider and

respond to the Highway #7 widening and ALTO. Actually, all three need to work together and with RNUP too. Before final decisions, several questions about the relationship will need answers. There are surely many more! Here are seven:

A. When will the #7 widening actually begin construction? The EA study will take at least 2 years from the fall of 2025, but no timing or financial commitment has been made by the province to actually build the road. No doubt it will happen, but when?

B. Will the highway need any hectares from the Pickering Lands for a bypass if that option is chosen or, further east, for the additional two lanes? Without a bypass – a similar question.

C. Will the provincial EA recommend a level crossing wherever Highway #7 meets the CPKC Havelock Line? Or a fly-over / underpass? If the corridor is carrying ALTO's 12 to 20 or more trains a day through this point, a grade separation will surely be preferable for both ALTO and the Ministry of Transportation. Indeed it is hard to imagine either project without one.

D. Will ALTO enter the east GTA and Toronto following the Havelock Line corridor through the Pickering Lands? There may be cost savings.

E. If ALTO enters the east GTA through the Pickering Lands, and if the idea of a suburban GTA station is accepted for the east end, where will it be? My suggestion is east Markham, but others think that it should be just west of Brock Road in the Pickering Lands next to the CPKC line or just to the east where it meets the line in Claremont on private lands.

F. Will Transport Canada give ALTO the land needed for a station free? With tangible benefits for the park, RNUP might do so for a station in east Markham. Putting it in north Pickering as compared to east Markham would significantly raise the inconvenience factor for commuters and other passengers in the east GTA.

G. How will the main RNUP north-south hiking trail cross the rail line? The park in Markham has a spine trail which will eventually be part of its link between Lake Ontario in Toronto and the Trans Canada Trail in Stouffville – Uxbridge. Wonderful. Level crossings of the 4-lane Highway #7 and ALTO would be dangerous.

6. ARE THE FORMER AIRPORT LANDS IN THE GREENBELT? The Greenbelt was established in 2005 by Ontario to protect the environmental and agricultural lands surrounding Canada's largest urban complex, the GTA. Because the Pickering Airport lands were federal, they were not formally included in the Greenbelt. Four important points need to be made:

The federal government has a policy of doing its best to work with the provinces and municipalities to respect land use policies in the areas where it owns lands,

If these lands were not owned by Ottawa, the surrounding provincial designations of Greenbelt and Oak Ridges Moraine would apply to them too - without a doubt. As it did with RNUP's predecessor, Rouge Park. This is easy to demonstrate with just one glance at a map.

Rouge National Urban Park was given royal assent in 2015. Within a few years, it acquired two large parcels of airport lands when it became apparent that they were not needed for a smaller, regional airport. RNUP is a national park, and its Act was amended shortly after 2015 to add an environmental emphasis equal to or better than the Greenbelt.

Almost every map I've ever seen shows RNUP and the Pickering Lands in the Greenbelt anyway!

The answer to the question? No, the airport lands are not formally in the Greenbelt. But they might as well be. If not already expropriated for a federal airport, they would likely have gone into the Greenbelt. Taking lands out of the Greenbelt is something the Ontario public strongly opposes. Premier Ford has experience with this! Their exclusion, based on a constitutional distinction, should not be a loophole for development.

7. IT HAPPENED ON JANUARY 27, 2025. On that day, Minister of Transport and Internal Trade in the Trudeau government, and now Minister of Foreign Affairs in the Carney government, the Honourable Anita Anand announced that the Pickering Lands would not be used for a future airport. Her department's news release said, "The Government of Canada intends to transfer the high conservation-value lands to Parks Canada" for RNUP purposes. Commendable.

Supporting her at the announcement was Hon. Gary Anandasangaree, a local MP (Scarborough-Guildwood-Rouge Park). At the time he held the portfolio of Minister of Crown-Indigenous Relations under Prime Minister Trudeau. With PM Carney, he is Minister of Public Safety. The same release quoted him saying, "Today's announcement is a testament that everyday citizens and advocates can drive big changes. By working together to transfer the former Pickering Airport Lands to Parks Canada, we embark on a new chapter." Again commendable.

Other notables commented on the news. Mayor of Pickering Kevin Ashe added, "As host to a significant portion of [RNUP], we commend the commitment to advancing conservation efforts and enhancing one of the GTA's most cherished natural assets." A third time commendable.

Two questions come to mind:

To Whom Was Minister Anandasangaree Referring To? In his comments he thanked those in the public who provided leadership on the file. That would be organizations like Land over Landings and The Waterfront Regeneration Trust and people like the former Minister of State for the Environment, Hon. Pauline Browes. There are multitudes of both types in Pickering, Scarborough, and Markham. Much appreciated Minister!

What Did Minister Anand Mean By “High Conservation-Value Lands?” The best answer is to check CBC. The next day, they clarified her comment by quoting her as saying that this meant that “the vast majority” of the lands would go to Parks Canada to expand the national park. What would “the vast majority” of the approximately 3,500 hectares still in The Pickering Airport Lands be? My view? Ninety-five percent or so, which is about 3,300 hectares. She wanted most if not all the Pickering Lands to go into the Park; that’s excellent. Much less would be a seriously-broken, environmental commitment.

PS: the calculation above would leave about 200 hectares for other purposes. I developed this figure independent of any other factors but find it interesting that it is the same maximum figure in the Rouge National Urban Park Act, see section (16)(2), for lands that could be taken out for necessary urban infrastructure!

8. RECOMMENDATION #1: TRANSFER “THE VAST MAJORITY” OF THE PICKERING LANDS TO PARKS CANADA. Senior members of the current government made this promise 14 ½ months ago; it was the right thing to do then and remains so today. For three reasons – in no order:

Enhancing the Environment. RNUP’s role in the GTA will only grow. The park is our environmental legacy to future generations. We can barely imagine today how important it will be a century from now.

Preserving Valuable Farmland. The Pickering agricultural lands will become even more important in the future. The soil in this area is among the best in the country. As Canada develops programs for greater food security, agricultural lands nearest our large urban complexes will be the most valuable. These are already under government ownership! Why lose that advantage? The area reminds me of the Agriculture Land Reserve along the Fraser River in Metro Vancouver Regional District, the purpose of which is, in their words, “to protect agricultural land, support farmers, and strengthen the region’s food system.” They have policies in their Regional Growth Strategy to “guide the protection of agricultural land and promote long-term agricultural viability.”

Developing Tourism. For the surrounding municipalities, the park means jobs and economic development. The wisdom of expanding RNUP today will be lauded tomorrow as it joins the GTA’s leading attractions. It is already the second most popular park in Canada’s national park system and will surely, one day, surpass Banff.

9. RECOMMENDATION #2: MAKE SURE YOU TRANSFER ... ! Prior to discussing a few possible exceptions to the land transfer, there are two parcels to be transferred that need thinking through.

The first is a large parcel on the northwest side of the CPKC rail line as it traverses the Pickering Lands. There’s a jagged boundary line. Check the map; it stands out. It was likely held back during the two

post-2015 Transport Canada transfers to protect for the type of industrial / commercial development that surrounds most major airports in Canada - for warehousing, manufacturing of goods usually shipped by air freight, customs-handling offices, etc. There is a large complex like this in Etobicoke and Mississauga because of its proximity to Pearson International Airport. I was educated on the matter when, as Ward Councillor for east Markham in the early 2000s, I was on a committee established by the Greater Toronto Airport Authority to study the need for Pickering. This parcel should be transferred to RNUP.

I am writing a book on RNUP and one of the issues identified is park boundaries and public confusion. To avoid any private land inside the park, the formal boundaries are all-over-the-place. The public on the other hand desires easier-to-understand boundaries; I call these perceived boundaries. A railway is one example, and transferring this parcel to RNUP will diminish confusion.

There is a second parcel that also needs to be considered. This one involved early confusion for the City of Markham and Rouge National Urban Park. It's a small rectangular parcel just east of Markham Road in Markham at the far west end of the original Pickering Airport Lands. It did not go to RNUP with the earlier Transport Canada parcels. It can be found on the map in the materials distributed for this consultation. Thinking that it had been sent to RNUP in the 2010s, some inaccurate maps were distributed, now mostly corrected. I have never known the reason why it was withheld. It's not even on a public road.

PS: a personal discovery. It could be the private Markham Airport south of the hamlet of Dickson Hill in Markham. If this is correct, discussions should be held with Markham, York, the Toronto and Region Conservation Authority, and RNUP prior to any decision. Did Parks Canada refuse it years ago? After "the vast majority" of lands have been transferred in the next year or so (please, as early as possible), who will oversee the parcel if it is a remnant? Markham, the TRCA, Transport Canada? Rather than shunting it further down the road, your study should result in something definitive. The thought that it might be Markham Airport just came to me; for years I looked on it as a mapping error, a curiosity. Please correct me if I am mistaken. I have left comments above the PS as is. This parcel should not be transferred.

10. RECOMMENDATION #3: HOLD BACK TRANSFERS TO COVER ... ! There are a few uses for which I suggest some land should be held back. They are:

The Highway #7 widening and ALTO. This is discussed above in Studies One and Two and also in Seven Questions Relating to the Pickering Lands. Adding lanes to #7, the southern boundary of the lands, may require an allocation of 10 to 25 metres along the north side of the highway. There could be temporary construction requirements too. If the Havelock Line becomes the ALTO route in the vicinity of the Pickering Airport Lands, it may require a similar allocation. Havelock presently has only one rail line; ALTO will be two. Furthermore, if my suggestion of an east GTA station finds approval, 5 or 10 hectares may be required for an intersection and commuter and bus parking. If the station is located in RNUP, it would not impact the Pickering Lands.

The villages/hamlets. Brooklin and Claremont interface with the Pickering Lands and would do the same when RNUP comes to town. It is a Parks Canada requirement that there is no private land ownership in national parks. In Markham, this has never been a major problem, but the RNUP / private property lines are very erratic to say the least in Locust Hill from Reesor Road to York-Durham Line. Cedar Grove too. I suggest that the boundary between RNUP and the two communities be regularized so that it is easier for park visitors, residents and farmers and governments and agencies to understand. If a hectare is needed in this process and used for a few infill houses or a community facility, an allocation should be considered and Pickering consulted.

A strip of industrial / commercial. We've all seen the way major roads and highways across the province attract well-known companies like Honda along the 404 in Markham or IBM on the north side of Steeles near Woodbine. The companies want to build a modern office and warehouse complex and seize big-time advertising too. With easy access for employees as well. The local municipality knows that landing a Honda or an IBM and their significant annual commercial / industrial property taxes is an excellent way to keep residential taxes down. With the frontage being a new 4-lane, increased volume, Highway #7, an allocation should be made to facilitate this type of use on the north side of #7 where it presently serves as the southern boundary of the Pickering Lands. One property deep only. There should also be a window on the park and entry point in the same stretch. Perhaps the allocation should be sold to Pickering as a linear industrial park.

Other infrastructure services. Within the public's perceived boundary of the current RNUP in Markham are such uses as Hydro One transmission lines, a TransCanada natural gas pipeline, two major Region of York sanitary sewers, CPKC and CN rail lines, and three levels of public roads from provincial to lower-tier. Some are in, and some are excluded from the formal park. Another reason for the convoluted boundaries! This kind of determination will need to be made before the land transfer to RNUP. Surely a few hectares will be held back. The roads especially will require negotiation; if they are excluded as in Markham, will the City of Pickering be expected to handle the maintenance and snow ploughing? Or, is the city doing it now under an arrangement with Transport Canada? Is the compensation adequate? Will payments in lieu of taxes increase? Any changes in the way urban infrastructure is dealt with as the lands go to RNUP will be complicated; I feel certain that there are presently differences in approach between Transport Canada and Parks Canada on behalf of RNUP on this matter. Note that earlier comments about the parcel south of Dickson Hill may fall into this section.

PS: when dealing with Parks Canada, I stated on behalf of Markham and York that the maximum of 200 hectares that could be removed in the Rouge National Urban Park Act for urban infrastructure purposes was adequate for the foreseeable future. I still don't see a problem in the near future even with the potential impact in the combined 3 studies if what is recommended is close to what I have outlined. But, with the addition of the last Pickering Lands parcel, consideration should be given to an increase to, perhaps, 300.

11. RECOMMENDATION #4: DO NOT DEVELOP THE PICKERING LANDS FOR HOUSING. We all know of the serious housing issues that confront Canada, especially in the urban centres. Rental rates for condos and apartments are too high and the purchase price of new or previously owned homes, even townhomes, is well above reasonable. Many have said that the Pickering Airport Lands could provide an opportunity, if converted to housing, to take a bite out of the problem. It's enticing – the land component of new house prices would be reduced. But I don't support the idea.

Under JH Recommendation #1: Transfer "the Vast Majority" of the Pickering Lands to Parks Canada, I gave three strong reasons for adding the lands to RNUP: enhancing the environment, preserving valuable farmland, and developing tourism.

There's another strong reason. It's a negative one for housing – which would include a smaller percentage for industrial / commercial. This option would bring a massive increase in traffic, surely Toronto and the GTHA's number one problem. That's the last thing GTA residents need, including their governments at all levels. From Clarington to Hamilton, and Newmarket down to the lake is the most sprawling urban complex (or is it second to Los Angeles?) in North America. With the worst traffic. Our commuting times are terrible and the Canadian economy is losing billions because of it. Canada is huge and past planning practices have led us to this. Unlike most places in the world, there's always more greenfield land in Canada to develop. There still is. Canadians wanted affordable ground-level residential in the past and their governments approved it. You can see the result.

How many commuter cars? I have no estimate of how many new homes 3,500 hectares would produce, what with condos, townhomes, semis and singles, and holdbacks for schools, parks and valley lands, an industrial / commercial component, and municipal infrastructure like roads and libraries. At least 20,000? With an estimate of 1.5 commuting cars per home – that's 30,000 more on GTA roads every morning and evening. It will be decades before jobs in the area catch up to the new homes, and the vast majority of homeowners will commute by car to the south and west, to Toronto, York and Peel. Quite a distance. The local bus service would be far too slow. It means many more cars on Highway #7, Steeles, and the 401. Governments can barely afford the demand for rapid transit in the GTA today - new subways, Light Rail Transit, Bus Rapid Transit in designated lanes, GO and ALTO. These services likely won't come to the Pickering Lands for years partly because of catch-up priorities elsewhere. Our sprawl includes employment locations too and rapid transit may not go to where the new residents want to commute to anyway!

The answer to Canada's housing dilemma? Intensification in areas already developed.

12. CONCLUSION: GET ON WITH IT. Transferring the bulk of the Pickering Airport Lands to Parks

Canada is the right thing to do. Do it quickly, although I trust a second set of public sessions will be held first - under the title, “Here’s What We are Proposing to Do.”

All the best in your deliberations.

Jack Heath

Former Deputy Mayor of Markham / Former Vice Chair, TRCA

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Note: these comments and attachments are not confidential.