



**By Electronic Submission  
June 29, 2022**

York Regional Council

**Re: June 30, 2022 and draft Regional Official Plan Amendment**

Dear Regional Chair Emmerson and Regional Councillors:

Since 1990 Save the Oak Ridges Moraine (STORM) Coalition has been the leading voice of the movement to protect the Oak Ridges Moraine. We've had major victories along the way- the most significant being the 2001/2002 Oak Ridges Moraine Conservation Act and Plan. Since April 22, 2002 with the release of the ORMCP, there has been relative certainty about where and where not new urban development can be directed on the Oak Ridges Moraine and Greenbelt. However, since 2018 there has been a concerning shift in attitudes and intentions emanating from the provincial government and subsequently a number of municipalities. The lack of regard to meeting the intent and letter of the law of the Greenbelt Act and the Oak Ridges Moraine Conservation Act and their associated regulations, the Greenbelt and Oak Ridges Conservation Plan has unified and energized civil society and cannot be ignored.

We respectfully disagree with Mayor Lovatt's characterization of the countryside designation of the Oak Ridges Moraine in Whitchurch-Stouffville as being based on "unscientific mapping and planning". The lands in question have long been known as having significant, sensitive and complex hydrological features and functions. The areas along the south slope of the ORM are underlain by the ORM Aquifer and covered by a relatively thin layer of till. This aquifer is essential in maintaining the health of the streams that originate in this area as well as replenishing deeper aquifer systems. The streams are integral to maintaining the quality and quantity of water entering important natural areas to the south, including the Rouge Park lands. This was a prime consideration in including this area in the Oak Ridges Moraine Conservation Plan's regulated boundary from the outset. Subsequent studies carried out by both the Ministry of the Environment (MOE) and the Toronto and Region Conservation Authority have confirmed the importance and sensitivity of these lands. The continuation of urban development into these areas would no doubt have greatly diminished the quality of the water resources in the streams and shorelines of Lake Ontario. A key objective of the ORMCP is to protect and where possible improve water quality and quantity. On this basis, I believe the areas identified are essential to include in the ORMCP.

**Celebrating 31 years of protecting the Oak Ridges Moraine...one kame at a time!**



The argument that the identification of this area was based on topographical elevation is also incorrect. In fact the area was identified first based on an understanding of hydrological features and, the 245-metre elevation was added to help facilitate provincial ground-truthing of the southern limits of the ORMCP.

The Mayor's argument that development of additional industrial land in the Gormley area is necessary and will have no effect on the integrity of the ORM is wrong. What he is proposing is incremental planning wherein the effects of one or two projects can be proved to have minimal effect on the environment when in fact it is the cumulative effect of these small one-offs that create degradation to the larger hydrological regime. In fact, the basis of the Oak Ridges Moraine Conservation Plan and Greenbelt Plan was to take a landscape-scale perspective to avoid this incremental approach to planning. In our opinion, approval of new development in the Countryside Areas only creates precedence for similar attempts in other parts of the ORM.

We certainly sympathize with the Mayor who points out that largely rural municipalities have tremendous fiscal challenges; the long term solution to such problems cannot be to perpetuate the never ending expansion of urban areas. The provincial Growth Plan encourages all municipalities to look at more compact and energy efficient growth forms.

We would urge Council to take no further actions that undermine the intent and purposes of these provincial conservation plans. Now more than ever we need to protect these natural areas to help mitigate and adapt to the impacts of climate change.

With regards,

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(written in collaboration with Fred Johnson, Ministry of Natural Resources, Retired)

