

**Jim Robb**  
Rouge Duffins Greenspace Coalition Volunteer  
General Manager, Friends of the Rouge Watershed  
1 Braeburn Blvd., Scarborough, ON, M1J 2P9

**February 23, 2010**

Town of Markham  
Markham Civic Centre  
101 Town Centre Boulevard,  
Markham, Ontario, L3R 9W3

**Re: Urban Expansion Contrary to Planning Act, Policy Statements and Public Interest**

**Dear Markham Mayor Frank Scarpitti and Council:**

Over the last several months, ratepayer and environmental groups have worked to increase public awareness and involvement in the crucial planning for Markham's future. Together, we have encouraged hundreds of people to attend Markham's December 1, 2009 and February 16, 2010 public meetings. Markham can be proud of these democratic public meetings.

**Sixty percent of Markham has already been swallowed by the urban envelope.** This represents the loss of 127 square kilometres of the finest foodland in Canada. Further urban expansion would represent an unbalanced and unsustainable "bite by bite" destruction of Markham's farmland.

According to a January 2010, public opinion poll, more than 80% of Markham residents favour the protection of Markham's remaining farmlands and greenspace. Based on my communications with many Markham ratepayer groups and residents, I believe this poll reasonably reflects public opinion.

Between 2002 and 2005, the Rouge Duffins Greenspace Coalition, worked with community and environmental groups and forward-thinking political leaders (Hon. David Crombie, Hon. Dalton McGuinty) and the provincial government to protect the 3000 ha Duffins Rouge Agricultural Preserve in Pickering and eastern Markham, despite intense municipal and developer opposition.

This nearby precedent demonstrates that Markham Council has the opportunity to work with ratepayer and environmental groups and the Province to create a Markham Foodbelt between Major Mackenzie Drive and the ORM. Markham can protect its remaining rural heritage and farmlands by asking the Province to expand the Greenbelt between Major Mackenzie Drive and the ORM.

By rising to this challenge, Markham will affirm its leadership and dedication to sustainability, create a proud legacy and "lead while remembering". If you fail to seize the Markham Foodbelt opportunity, you will let down past, present and future generations of Markham residents. Attached please find a slide show supporting the Markham Foodbelt and a halt to urban expansion.

**Law, Policy, Science and Public Interest do not Support Urban Expansion**

After reviewing York Region and Markham Staff Growth Plan Reports, recent TRCA scientific findings on the Rouge River Watershed, and Reports by Ontario's Environmental Commissioner, I firmly believe that <sup>the</sup> Growth Plan proposed by York Region and Markham Staff is unscientific, unsustainable and contrary to the *Planning Act* and associated Provincial Policy Statements.

## **Growth Targets Established without Proper Scientific Studies & Public Consultation**

In his 2006/07 Annual Report, Ontario's Environmental Commissioner notes:

“The province established population projections for some communities subject to the Growth Plan, before assessing the related water and wastewater infrastructure needs, their associated costs and environmental impacts. **This puts the cart before the horse.**  
....many parts of Southern Ontario have reached their capacity to accommodate additional infrastructure, housing and human populations.”

## **Planning Act Context**

The old *Planning Act* required that Planning Authorities “have regard for” Provincial Policy Statements. The updated *Planning Act* applies a much higher test by stipulating that:

*Decisions of planning authorities “shall be consistent with” provincial policy statements.*

## **Urban Expansion - Contrary to Provincial Policy Statement for Water Protection**

Provincial Policy Statement 2.2.1 states: Planning authorities **shall protect, improve or restore the quality and quantity of water** by: a) using the watershed as the ecologically meaningful scale for planning; and b) minimizing potential negative impacts, including cross-jurisdictional and cross-watershed impacts.

Despite this Provincial Policy, the Provincial Growth allocations to York Region and Markham were established prior to the completion of the Rouge Watershed Strategy and Report Card in 2007.

The TRCA's Rouge River Watershed Strategy Scenario Modeling and Analyses Report concludes:

**“meeting water quality targets will become an increasingly distant goal  
as the footprint of development expands”**  
Section 4.2.9 Summary and Conclusions

**As the urban envelope expands, E. Coli and chloride levels exceed provincial standards**  
Section 4.2, Figures 4.2-6 and 2.8

“Several studies suggest that the maximum impervious cover that a watershed can withstand before experiencing **severe hydrologic changes and consequent geomorphic and ecological impacts is approximately 10%.** “The **Main Rouge subwatershed** has been subject to significant urbanization with an approximate **total impervious cover of 18% as of 2002.**”  
Rouge River Report Card (2007) Key Findings - Surface Water

“middle tributaries (Markham communities) would be subject to **major hydrological impacts**”  
**if the urban envelope is expanded**  
S. 4.1.49 - Rouge River Watershed Strategy and Implementation Plan  
Scenario Modeling and Analysis Report

“The best results for the terrestrial ecosystem would be achieved if the expanded natural vegetation cover plan (TRCA) was implemented and new urbanization only occurred within current official plan boundaries.”

Rouge River Watershed Plan 2007, page 94

### **Unrealistic Promises of Future Mitigation Effectiveness and Associated Taxpayer Burden**

Developers and their consultants can provide slick presentations and promises about advanced methods for protecting water quality and quantity. However, their track record has proven that such presentations and promises are both unrealistic and unreliable. Twenty years ago, stormwater ponds were touted as the answer to the protection of water quality and the avoidance of flooding and erosion. We now know that despite the proliferation of such ponds, erosion and water pollution have increased due to urban envelope expansion. In addition, mitigation measures like stormwater ponds require ongoing maintenance and investment. Complicated mitigation measures create an additional tax burden which municipalities sometimes delay to control tax increases, leading to reduced mitigation effectiveness and increasing pollution over time.

The 2007 Rouge Watershed Strategy found that pollution, erosion and flooding would increase due to already granted approvals within the existing urban envelope. Given the policy framework, the flooding vulnerability of existing communities like Unionville, the scientific findings of the 2007 Rouge Watershed Strategy, the disconnect between mitigation promises and results, and the increasing frequency of severe climatic events, Markham would not be diligent, if it further expands the urban envelope.

### **York's Growth Plan - contrary to Public Support for Local Foodland Protection**

According to the Key Findings of Markham's Agricultural Assessment (2009)

- The land base in the rural area of Markham is comprised of prime agricultural land as defined in the Provincial Policy Statement (PPS) with the majority of the land qualifying as Class 1. Class 1 land is a limited, non renewable resource in Canada comprising only .5% of the Canadian land mass.
- Markham enjoys a climate that supports higher productivity and longer growing seasons which when combined with the soil resource, allows a flexible and diverse production profile. Commodities such as fruit and vegetables, which are difficult to grow in less temperate areas, grow well in Markham.
- The number of farms and area of farmland is declining more rapidly in Markham than in adjacent municipalities, the Region of York as a whole or the Golden Horseshoe. Between 2001 and 2006, the amount of farmland in Markham declined by 43% as compared to York Region at 5% and Ontario at 1.5%.

Provincial Policy Statement 2.3.1 states:

*Prime agricultural areas shall be protected for long-term use for agriculture.*

With the growing public support for local food production and the importance of local food security in a time of climate change and population growth, it makes no sense to pave-over some of the finest foodland in Canada in one of our best climate zones.

Provincial Policy Statement 1.3.9 does allow the designation of a settlement area within an agricultural area where it has been demonstrated that a) sufficient opportunities for growth are not available through intensification, redevelopment and designated growth areas to accommodate the projected needs over the identified planning horizon; and b) “the infrastructure and public service facilities which are planned or available are suitable for the development over the long term and **protect public health and safety**”.

### **Urban Expansion – Contrary to the Protection of Public Health and Safety**

The proposed expansion of Markham’s urban envelope is contrary to public health and safety. Scientific research and monitoring clearly shows that urban expansion would lead to increased E. coli bacteria and pollution in our water and increased flooding and erosion damage in vulnerable downstream Markham communities. For example, the TRCA’s 2007 Rouge Watershed Report Card and Rouge Watershed Strategy Scenario Modeling and Analysis Report, state:

“Modeling indicates that the **middle tributaries** would be subject to **major hydrological impacts** under OP build-out and full build-out conditions” ... *Page 4.1.49*

.... “future urbanization will increase the magnitude and duration of erosive flows in receiving watercourses despite the use of current extended detention criteria to control runoff from more frequent events”. *Page 4.1-43*

“Given the HSP-F modeling results and the findings of other researchers, there is some doubt as to the whether stormwater management ponds based on synthetic design storms are sufficient to fully mitigate the effects of urban development on flooding under real world rainfall (and snow) conditions.” *Flooding - Page 4.1.38*

**“flood-vulnerable roads (129) and flood vulnerable areas (533 properties and/or buildings)** Remain in the Rouge River watershed. The majority of these are located within the Town of Markham, along the Main Rouge River .... The relatively flat topography and the lack of valley definition of the Rouge River and its tributaries as the river flows east-west through Markham make this area particularly vulnerable to flooding.”

**“Over 500 flood vulnerable areas within Markham would be expected to be inundated** during the Regional Storm (Hurricane Hazel) and a number of roads and homes are predicted to flood in flows as low as the 2-year flood event.”

*Rouge River State of the Watershed Report (2007) Page 5-25*

Many scientists are observing and predicting significant increases in the frequency and intensity of severe storm events and flooding due to global warming. Within this context and with the existing scientific information, the currently envisioned expansion of Markham’s urban area is unscientific and unwise. It lacks the due diligence required to avoid increased damage to public health and safety, and private and public properties, within Markham’s many flood vulnerable areas.

## **Unwarranted Employment Land Expansion onto Farmland**

Below please find three statements from Markham's May 2009 Employment Lands Strategy:

- 1) "Markham's existing commercial land supply could physically support all the new retail development warranted by growth to 2031."
- 2) "Markham currently has an industrial (employment) land supply of approximately  $\pm 1,525$  net hectares - of which, approximately  $\pm 1,040$  net hectares are occupied, and  $\pm 485$  net hectares are vacant or underdeveloped.
- 3) "In more recent years, (industrial) land development trends in Markham have compressed somewhat, falling to between 22 to 25 hectares per year.

With an average recent uptake rate of 24 hectares per year and 485 hectares of vacant or underdeveloped land, Markham already has approximately 20 years of industrial land supply and "enough commercial land to support the new retail development warranted by growth to 2031".

As the three factual statements above reveal, there is little justification for expanding the urban envelope and paving more of Markham's irreplaceable farmland to pad Markham's existing inventory of employment lands. Excess supply leads to inefficient use and waste.

To respect the principles of sustainability, land conservation and leadership, Markham needs to find ways to provide employment without paving more of Canada's finest farmland. After all, farmland is employment land, and it does not require expensive servicing and infrastructure. In the future, the movement back to diverse and consumer supported agriculture (CSA) will enhance the already significant employment, economic and community benefits of Markham's farmland.

Existing employment lands can be expanded upward (more floors) and downward (underground parking) to conserve and efficiently utilize land. Changes to bylaws could allow greater site coverage in some cases. Mixed commercial residential developments offer great potential for efficient land use.

There are many creative opportunities for additional employment lands within the existing urban envelope (60% of Markham's existing land base). There is no pressing need to swallow-up and destroy more farmland by expanding the urban envelope.

## **Creation of Markham Foodbelt Represents Good Planning**

Professor Mike Bunce, a rural geographer and former Greenbelt Advisory Panel member, has written to support the Markham Foodbelt. As Professor Bunce noted, the creation of the Markham Foodbelt would promote good planning by:

- A) Protecting land surrounded by Rouge North Greenbelt corridors, - a logical Greenbelt addition;
- B) Protecting local foodlands of higher quality than most of the land within the Greenbelt;
- C) Retaining countryside buffers between Rouge North Greenbelt corridors and urban areas;
- D) Increasing residential and commercial densities within the existing urban envelope, an approach consistent with *Places to Grow Act* and sustainable community design.

**Conclusion:**

Markham has sufficient land already designated within the urban area to accommodate projected growth for more than several years. If Markham's Growth allocation is reduced and/or if Markham's existing urban land is used more efficiently, there will be sufficient opportunities for growth without expanding the urban envelope and paving Markham's farmland.

There is strong public support for the protection of Markham's farmland and quality of life. We trust this support will empower Markham Council to work with the Province of Ontario to expand the Greenbelt to protect the areas upstream of Markham's existing communities as a 2000 hectare Foodbelt and 1400 hectare Natural Heritage System.

Sincerely,

Jim Robb  
for the Rouge Duffins Greenspace Coalition  
1 Braeburn Blvd., Scarborough, ON, M1J 2P9  
Phone: 647-891-9550  
Email: [jimrobb@frw.ca](mailto:jimrobb@frw.ca) or [jim.robbs@rogers.com](mailto:jim.robbs@rogers.com)