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September 3, 2015

Mr Joseph Szwalek, Regional Director
Civil Aviation – Ontario
Department of Transport
4900 Yonge Street, 4th Floor
Toronto, Ontario M2N 6A5

Dear Mr Szwalek,

Land Over Landings is pleased to comment on the draft Pickering Airport Site Zoning Regulations (PASZR), published in the *Canada Gazette*, Part I, on July 18, 2015.

We are concerned about Transport Canada's continued protection of the last 8,700 acres of Federal Lands for a potential future airport. And we have concerns about the PASZR's content and the public consultation process.

- The land is almost entirely Class 1 farmland – the best there is. Class 1 farmland is rare, and growing rarer. At a time when human population numbers are exploding, and given that some 90 per cent of our food comes from crops, we cannot put at risk our future health and well-being by destroying the kind of productive farmland that, unlike lesser classes, can *reliably* grow crops every year.
- The airport site is immediately adjacent to the new Rouge National Urban Park, which is promising to become a jewel in our nation's crown. The mission and policies of the Park are diametrically opposed to those Transport Canada policies that govern the safe functioning of an airport.
- An airport requires that hazardous wildlife be scared off, trapped, or killed and that some habitats be altered or destroyed. In the case of a Pickering airport, this policy would have to be implemented, in part, within the boundaries of the Rouge NUP, a wildlife sanctuary, where wildlife and wildlife habitats are protected. How can this circle be squared?!
- A national park offers a place where people can picnic, camp, walk the trails, commune with nature, and seek beauty and peace. An airport offers the precise opposite of all those things. Its construction and operation would destroy the Park's peace and legitimacy.
- The Rouge NUP has the promotion and protection of agriculture as one of its three shining pillars. Yet Transport Canada's policies would limit the kind of mixed farming the Park is set to exemplify. So how would this work?
- The draft PASZR, while delineating the limits of the Wildlife Hazard Zone, barely touches on its ramifications. Is Transport Canada assuming (a) that no one will notice how its wildlife policy conflicts with the Park's and (b) that no one will see the consequences for the Park and its inhabitants?

- The draft PASZR is intended for the use of provincial and municipal planning departments, yet omits an element – noise contour maps – fundamental to any planning decisions in a potential future airport’s vicinity. How can informed planning be done without such data? Or does Transport Canada share the data with planners but keep it from the public? Whichever is the case, the practice is wrong.
- Airport and aircraft noise *must* be part of the broader discussion – not only because of the site’s proximity to the Park but also because of its proximity to many residential areas. The site is no longer at a considerable distance from built-up areas, as was the case in 1972. Urbanization is spreading to its very boundaries. An airport in north Pickering would be a noisy affair, and that noise would seem even louder than it is, given the area’s very low ambient noise levels. In short, airport and aircraft noise would have a significant impact on the lives of everyone in the vicinity – and not for the better. Is this why the PASZR, when listing land-use limitations, covers structure heights, wildlife hazards, and communications interference, but omits any mention of noise?

The last time Transport Canada sought public comment on the Pickering airport issue – in an online comment exercise after the June 11, 2013, announcement – the invitation stated that the Department “may elect to post summary findings of the consultation, and data will be aggregated.” But nothing materialized.

Minister Raitt twice assured Land Over Landings that she championed openness and transparency. We believe she meant it. And she undertook, at our first meeting, to have her staff prepare and make available to us a summary of the results of that online consultation. (Doing so would not have set a precedent; the results of a 2003 consultation are posted on your website for all to see.) While the results of the two public information sessions, held on June 24 and 27, 2013, were eventually condensed into a one-sentence summation during a subsequent meeting, there was no summary of the online consultation results, and the very mention of the consultation has been omitted from your materials as if it never happened. Yet we were told by the Minister that between 600 and 700 Canadians took the time and trouble to reply to that invitation. Why has all that public input been kept secret?

As for the present PASZR consultation, the public hasn’t even been offered the possibility of seeing “aggregated” data. So will this input be kept secret as well? Is it even considered by Transport Canada? Is it acted on? Will we ever know?

So many disturbing questions about an issue with the potential to disrupt and negatively affect so many lives. And nothing much in the way of answers to date. It would be reassuring to many people – and a breath of fresh air – if this practice of secrecy were replaced by the promised openness and transparency. We live in hope.

Thank you for the opportunity to comment.

Yours very truly,



Mary Delaney
Chair, Land Over Landings

**No one is going to look back 50 years from now and say,
“we protected too much green space and farm land”.**

~ Jennifer Keesmaat, Chief Planner for the City of Toronto, April 7, 2015