



P.O. Box 89052
HAMILTON, ONTARIO L8S 4R5

August 1, 2021

**Re: GRIDS 2 and Municipal Comprehensive Review – Consultation Update and Evaluation Framework
and Phasing Principles**

Dear Mayor Eisenberger and members of the General Issues Committee:

The 600-member Hamilton Naturalists' Club is one of the largest and most active naturalist organizations in Ontario and has advocated for nature since 1919.

On behalf of the Club, I reiterate the position that we took at the March 29 GIC meeting when we urged city council to make its best effort to freeze the urban boundary. We supported council's response to an ongoing groundswell of demand for public consultation by deferring a decision for an opinion survey that included a "no boundary expansion" scenario and a mailout. It was a start, at least, in public consultation.

Like many conservation and environmental groups, we're concerned about policies by the provincial government including mandated land use directives to the 2051 planning horizon that favour urban sprawl. The reduced density goals and addition of market demand as justification for planning the housing mix are among many questionable decisions by this government that have produced an unprecedented outcry from conservation and environmental groups in Hamilton and across Ontario.

Former environmental commissioner Diane Saxe has identified urban sprawl as the main cause of increasing carbon emissions at a time when we're facing climate change. Add to that the loss of agricultural land, when local food production is becoming more important, the risk to watersheds with all of the increased residential and commercial run-off, and the costs of extending infrastructure.

We're especially concerned about proposed development in Elfrida. We support the strong opposition to development in this area of the Bird Friendly Cities Hamilton/Burlington team, as outlined in previous letters to the committee, because of irretrievable habitat loss. It's one of the key threats to healthy bird populations.

The fields, streams and woodlots of Elfrida host a significant population of year-round resident birds and support a large number of migratory bird species on their journey from Central and South America to the boreal forest and tundra. In addition, they also support winter resident species and visitors such as Snow Bunting and Snowy Owl.

The welfare of many of these species is of critical concern. In March, American Kestrels returned to the Elfrida lands to breed. These highly valued small falcons are a priority species which control rodent populations but they've experienced a large decrease in population since 1970 because of the loss of

Hamilton Naturalists' Club is a non-profit organization dedicated to the study, appreciation and conservation of our wild plants and animals.
All work is freely done by Directors, Officers and Members.



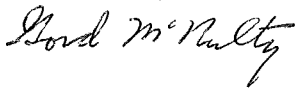
habitat. Killdeer, a plover that has adapted to agricultural lands, also breed in Elfrida but they have suffered a large decrease in population and will also lose their habitat.

Hamilton should aim to be part of the solution, rather than part of the problem, in achieving financially and environmentally sustainable planning. The goal should be to promote a healthier, greener and more attractive city. An emphasis on smart intensification and more compact development would also be more compatible with Hamilton's ongoing Urban Forest Strategy, which we're pleased to work with the city in strengthening.

The HNC urges City Council to underline to the provincial government that it does not agree with mandated land use directives that favour urban boundary expansion. Hamilton and municipalities across Ontario deserve better than more sprawling subdivisions on farmland and forests. This is an opportune time to send a message to the province that it should change course to promote more sustainable growth.

Given the limitations of virtual public engagement, we also urge City Council to consider increased opportunities for public consultation and participation in the evaluation framework and phasing principles.

Thank you for your time and attention.

A handwritten signature in cursive script that reads "Gord McNulty".

Gord McNulty

Conservation & Education Director, HNC