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November 23, 2022.

Minister Steve Clark
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th floor
Toronto, Ontario
M7A 2J3

RE: Impacts of Bill 23 “The More Homes Built Faster Act, 2022” on Ontario’s recreational trails

Dear Minister.

In Ontario, 500,000 volunteers develop and manage 80,000 plus kilometers of recreational trails providing numerous different activities for families, individuals, social groups, touring companies, and outfitters to use which are known to generate over \$12 billion in direct and indirect expenditure annually to Ontario’s economy.

Since 1974 the Ontario Trails Council (OTC) has provided community supported, professionally led expertise to all levels of government. These collaborations have led to productive relationships between OTC and activity leaders such as snowmobilers, ATV riders, hikers, cyclists, and all their respective associations.

OTC has also developed key relationships with economic development offices, regional tourism organizations and destination marketing organizations within government. Collaborations like these led to the creation of the Ontario Trails Strategy in 2005, and the landmark Ontario Trails Act in 2016.

For several years, OTC had regularly met with successive governments as a part of thorough public consultation, and specifically as part of an internal multi-Ministry to sector process, called the Ontario Trails Coordinating Committee (OTCC). This committee was led by government with all Ministries support and resulted in several successes including: the development of a regulatory/legal framework impacting trails, two public consultations, and 14 sector organizations. It’s worth noting that there was an “Amethyst Award” in 2014 for Excellence and Outstanding Achievement in Intergovernmental Affairs awarded for it.

We’re writing today to voice our concerns regarding all the organizations/entities impacted by Bill 23, such as the Greenbelt, the Bruce Trail, the Oak Ridges Moraine Trail, Durham Trails, the cities of Vaughan, Richmond Hill, Peel, Niagara, and York Region. Specifically, we see negative impacts on the recreational trail systems for all of these.

The OTC recognizes the value of housing, especially in an economy where each house is a taxable asset, the house is a form of equity, and, that housing developments often bring improved roads, water, and other municipal services. We also acknowledge that there is a housing need in the province, particularly in respect of affordability and shortages looking forward. We also acknowledge that increased housing and those living in them, will drive increased trail usage.

In fact, our experience tells us that most people want more trails and trails closer to, not further away from their house. We also know from realty studies that housing values are greater in closer proximity to a trail and that housing companies charge premiums for this advantage, like waterfront housing.

Nonetheless, the proposed development that could result from Bill 23 is a concern for OTC. In our experience many promises are made by realtors, builders and others in the housing and property management industry such that upon submission of a plan “trails will be included” as part of the development. Yet upon completion of many housing developments, trails do not materialize, and developers are not held to account for failing to deliver them.

Organizations like municipalities and conservation authorities (and others mentioned previously) serve to provide tools for balance between the interests of the building and construction sector, and the recreational needs of the public.

Of course, the OTC are not anti-housing, anti-development or anti-government, in fact OTC have worked with all governments since 1974 to promote recreational trails as a function of development. It’s key to note, that past conservative government such as the Davis, Harris and Eves’ government made significant contributions to trail systems province wide.

Minister, we are heartened by your appointment given that when you were in opposition, your own letters in support of the Ontario Trails Act 2016, helped preserve snowmobile trails in Leeds and the Thousand Islands, and just recently, due to this foresight, the MTO has signed off on a new snowmobile trail on the Thousand Island Parkway Trail. This is legacy work Minister, and the OTC is glad for it.

In Ontario, it should be noted that many trails exist because of the conservation of land, for which there are many Ontario agents, Ontario Parks, Parks Canada, Crown Forests, County Forests, Biosphere Reserves, the Bruce Trail Conservancy, Escarpment Biosphere Reserve, Crown Land Reserves, Federal Waterways, Hydro Corridors, and conservation authorities. We are deeply concerned that the potential of weakening the role of any of these, in turn weakens the existing trail network in the province and the potential of trails yet to come.

In closing, we call on you Minister to reconvene the Ontario Trails Coordinating Committee for you to seek our advice on Bill 23 and its impacts on recreational trails. Please contact me at your earliest convenience to further discuss.

Thank-you.



Patrick Connor BA (Hons) C.A.E., S.S.A., Dipl. M.M.
Executive Director, Ontario Trails Council.

c.c. Minister Neil Lumsden, Minister of Tourism, Culture and Sport,
Minister David Piccini, Ministry of the Environment, Conservation and Parks; and
Minister Graydon Smith, Minister of Natural Resources and Forestry.