

Thompson, Tiffany

From: Sher Arnfinson <sher@shiatsubysher.com>
Sent: Thursday, January 04, 2018 1:23 PM
To: ERRC
Cc: Customer Service
Subject: Freele Forest

County of Simcoe,

You need to find an appropriate site other than the Freele Forest, better suited for your industrial project. Our **Natural Heritage** needs to be protected, not developed to manage garbage. There are existing industrially-zoned sites which would be far more suitable and cost effective, as evidenced by the County's recent offer of multiple 100 acre+ site options to "Amazon".

Concerned resident,
Sher Arnfinson



Cell: 416-345-0000

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www.avast.com

From: Mary Wagner [<mailto:yramrengaw@hotmail.com>]

Sent: Tuesday, March 06, 2018 1:40 PM

To: Daly, John <John.Daly@simcoe.ca>; Customer Service <CustomerService.Service@simcoe.ca>; ERRC <ERRC@simcoe.ca>; Renee Chaperon <renee.chaperon@springwater.ca>; French, Bill <Bill.French@simcoe.ca>; Allen, Don <Don.Allen@simcoe.ca>; Warden <Warden@simcoe.ca>

Cc: Heather Rutherford <rutherford_heather@hotmail.com>; Cindy & Randy Mercer <mercercr@rogers.com>; Lynda <lynda@nicholyn.com>; Bob Wagner <bob.wagner@cibc.com>; Joe Hermann <Jhermann@sympatico.ca>

Subject: ERRC site selection

Dear Sirs/Madams

It has come to our attention that the Region is considering the selection of 2976 Horseshoe Valley Rd West as the site for the Simcoe County ERRC.

This decision would be bad for local residents and the environment. Most importantly, such a decision is not consistent with the Growth Plan 2017.

The Growth Plan (2017) replaced "Places to Grow – the Growth Plan for the Greater Golden Horseshoe, 2006".. The Growth Plan is the province's long term planning strategy to protect the natural environment and curb sprawl while building complete communities. The Growth Plan is a provincial plan that Simcoe County and Springwater Township planning authorities must conform to when making planning decisions.

Simcoe County is within the 2017 Growth Plan Area and the province has created an Agricultural System and a regional scale Natural Heritage System for the Greater Golden Horseshoe (GGH). The mapping for these systems was released in February 2018.

Below please find an excerpt cut from the MMAH webpage.

Infrastructure

The Greenbelt Plan and the Growth Plan both state that existing, expanded or new infrastructure approved under the *Environmental Assessment Act* is permitted if it serves the significant growth and economic development expected in southern Ontario. Locating infrastructure in the NHS, key natural heritage features, key hydrologic features and key hydrologic areas is discouraged wherever possible. Where there is no reasonable alternative, impacts on the features and their functions must be minimized and mitigated.

Both plans also discourage locating infrastructure within prime agricultural areas. In situations where avoiding prime agricultural areas is not possible, an Agricultural Impact Assessment or equivalent analysis as part of an environmental assessment is required to demonstrate how impacts on the Agricultural System will be avoided, minimized or mitigated.

In some cases, the Greenbelt Plan includes more specific requirements on planning, design and construction of infrastructure than the Growth Plan. These include:

- **requiring that planning, design and construction practices minimize the disturbance of the existing landscape, including impacts caused by light intrusion, noise and road salt, wherever possible**
- **requiring that, where practical, existing capacity and co-ordination with different infrastructure services be optimized to maintain the existing character of the Protected Countryside**
- **requiring that infrastructure planning, design and construction practices maintain or improve connectivity between features where reasonable**
- **prohibiting new waste disposal sites and organic soil conditioning sites in key natural heritage features, key hydrologic features, and their associated vegetation protection zones**

Given the clear direction from the province that the site of [2976 Horseshoe Valley Rd](#), or another forest within the greenbelt is not to be used for prohibited infrastructure or settlement expansion, why does the county continue to spend taxpayer money in pursuit of this apparently misguided project? This ERRC is an industrial facility that belongs in an urban or developed setting, not in nature.

The update of studies by GHD at the request or direction of Simcoe County Planning Authority are not consistent with provincial policy as stated. Our lawyer will be providing the County with an opinion letter shortly outlining the consequences of proceeding in the Horseshoe Valley Rd location.

Regards.
Mary Wagner
President
FSF

From: Mary Wagner <yramrengaw@hotmail.com>

Date: March 6, 2018 at 8:29:52 AM EST

To: "bmauro.mpp.co@liberal.ola.org" <bmauro.mpp.co@liberal.ola.org>, "kwynne.mpp@liberal.ola.org" <kwynne.mpp@liberal.ola.org>, "ahoggarth.mpp.co@liberal.ola.org" <ahoggarth.mpp.co@liberal.ola.org>, "julia.munro@pc.ola.org" <julia.munro@pc.ola.org>, "ahorwath-qp@ndp.on.ca" <ahorwath-qp@ndp.on.ca>, "jim.wilson@pc.ola.org" <jim.wilson@pc.ola.org>, "vic.fedeli@pc.ola.org" <vic.fedeli@pc.ola.org>, "leader@gpo.ca" <leader@gpo.ca>

Cc: Renee Chaperon <Renee.Chaperon@springwater.ca>, "Daly, John" <john.daly@simcoe.ca>, "info@simcoe.ca" <info@simcoe.ca>, "errc@simcoe.ca" <errc@simcoe.ca>, Heather Rutherford <rutherford_heather@hotmail.com>, "Cindy & Randy Mercer" <mercercr@rogers.com>

Subject: Re: Grow the Greenbelt to Simcoe County

March 5, 2018

Protecting Water Consultations
Ministry of Municipal Affairs and Housing
Local Government and Planning Policy Division
Provincial Planning Policy Branch
777 Bay Street, Floor 13
Toronto ON
M5G 2E5

Re: Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring
EBR Posting #013-1661

I am writing on behalf of the Friends of Simcoe Forests Inc. (FSF), a non-profit organization consisting of concerned citizens within Simcoe County, Ontario. Our long-term goal is to inform and unite people who are interested in the conservation of our County's forests. We encourage all local residents, visitors and friends of our environment to realize that they can enjoy the natural flora and fauna of the region, as well as the natural beauties of the forests within Simcoe County. As a group, we encourage beautification, preservation, and extension of parks and Green Belts. Through our mutual love and concern for the County's forests, we strive to make available all known statistical, scientific, horticultural and botanical information that positively impacts the future of our forests. It is our goal to promote the protection and appreciation of the environment and lands which are there for all of us and future generations to use and enjoy.

As an organization, FSF was thrilled to discover that the Province is considering an expansion to the Greenbelt Plan Area within Simcoe County (Oro Moraine – Study Area 4). While we understand that the Province's intention is to protect important water features, given the complex inter-relationship between ground and surface water and terrestrial features such as woodlands, we are confident that the protection of water resources will also assist in protecting the valuable woodlands within the Oro Moraine study area. As a result, we fully support the expansion of the Greenbelt Plan Area into Simcoe County.

The Province recently released the Growth Plan Natural Heritage System which identified a natural heritage system within Simcoe County. FSF appreciates the Provincial recognition of the important natural heritage features and functions that exist within Simcoe County and recommend that the next step is to protect these areas within a permanent Greenbelt Natural Heritage System. We recommend that the Province incorporate the Growth Plan Natural Heritage System, within Simcoe County, into the Greenbelt Plan Natural Heritage System.

FSF was formed in 2016 in response to a County proposal to construct a waste management facility within a significant woodland in Springwater Township. The preferred site that was selected by the County is currently the subject of a County and Local Official Plan Amendment (OPA) and Zoning By-Law Amendment application process. The Province (MMAH), as the approval authority for the County OPA, should be aware that the facility is proposed within the Growth Plan Natural Heritage System as well as within the Oro Moraine Study Area for Greenbelt Plan expansion. We trust that the Ministry will take this into consideration when reviewing the County OPA.

Thank you for the opportunity to provide input. Please keep us informed of any future public consultation opportunities.

Yours truly,

Mary Wagner
President
Friends of Simcoe Forests Inc.

March 2, 2018

Aldo Ingraldi, MCIP, RPP
Senior Planner
Municipal Services Office – Central Ontario
Ministry of Municipal Affairs
777 Bay Street, 13th Floor
Toronto ON M5G 2E5

Dear sir;

**Re: Impacts to Regional Natural Heritage System by Proposed County of Simcoe
Environmental Resource Recovery Center (ERRC), Springwater, Ontario**

Dougan & Associates Ecological Consulting and Design (D&A) was retained by Friends of Simcoe Forests Inc. in March 2017 to provide peer review services for natural heritage impact studies being completed for the proposed Environmental Resource Recovery Center, Springwater, Ontario. This facility has been proposed by the County of Simcoe to be located within the Simcoe County Forest, within an area known as the Freele Tract.

Our purpose in writing at this time is to inform MMAH of the known significance of the natural heritage system at the site and in its vicinity, based on our review of documents prepared in support of the facility by GHD Ltd., our own site reconnaissance, and observations of others affiliated with the Friends of Simcoe Forests Inc., including Mr. Bob Bowles, a highly respected field scientist who is also engaged by the FSF Inc.

We note that the Province has published its own Regional Natural Heritage System (RNHS) mapping that will form the basis of planning under the Growth Plan (2017), and under the Greenbelt Plan (2017). On-line mapping of this system currently indicates the County's preferred ERRC site is located within the RNHS, with woodland cover throughout the site, and unevaluated wetlands in the northeast corner of the site.

Based on the GHD studies and reconnaissance on behalf of FSF Inc., we believe that the following Provincial Policy Statement categories of natural heritage features are present on the site:

Significant Woodlands – the site includes natural forest (upland deciduous forest and swamp) as well as plantations that are all in an advanced stage of succession towards mixed natural forest with associated understorey flora typical of natural forest. At least 21 species of area-sensitive birds (based on MNR criteria) have been documented by GHD, indicating that this forest is part of a larger forested system and the site itself is relatively free of forest edge influences. The forest is located on varied terrain, ranging from low-lying areas with vernal pools, to significant sandy feature deposits (the latter directly under the proposed ERRC).

Significant Wetlands – the site contains two areas of wetlands with swamp and marsh cover; the RNHS mapping shows the northeast component; a second area of forested swamp is located in the southeast corner of the site, tied to a seasonal headwater watercourse. Vernal pools are present in both areas of wetland (see Significant Wildlife Habitat). These wetlands are not currently evaluated, but given their connection to offsite wetlands, and the documented presence of significant and diverse biota, we believe that it is quite feasible that they would score as a Provincially Significant Wetland.

Significant Wildlife Habitat (SWH) – the following categories of Significant Wildlife Habitat, per MNRF SWH Criteria Schedules for Ecoregion 6E (2015):

- Amphibian Breeding Habitat (Woodland) which is present in both the northeast and southeast wetlands; MNRF guidelines recommend a 230 m buffer around such features;
- Special Concern and Rare Wildlife Species (Western Chorus Frog, Eastern Wood-Pewee, Red-Shouldered Hawk, Wood Thrush); rare plants;
- Woodland Area-Sensitive Bird Breeding Habitat, well exceeding the MNRF threshold for significance;
- Woodland Raptor Nesting Habitat (potential) as three of six indicator species were documented by GHD;
- Bat Maternity Colonies.

Notably, in 2016 GHD incorrectly concluded that cultural plantations do not qualify as SWH; this is counter to MNRF Ecoregion 6E Criteria, which do not exclude plantations, and in some cases (e.g. raptor nesting) highlights them as potential habitat.

Habitat of Endangered and Threatened Species – Three Provincially Endangered bat species have been documented on the Freele Tract site, and habitat use by these species includes maternity roosts, day roosting and foraging. We believe that there is also potential for Endangered Jefferson Salamander hybrids to be using the vernal pools.

Natural Heritage Concerns with the County ERRC Proposal

Our June 2017 review of the studies supporting the County’s proposal to locate the ERRC in the Freele Tract identified several key concerns regarding natural heritage impacts, including the following:

1. The facility will cause significant fragmentation of the forested NHS, and will degrade the quality of forest. We estimate that approximately 18 ha of forest interior will be eliminated.
2. The proposed facility is within identified Significant Woodlands, as recognized in the County Official Plan (2016), and the Province’s Regional NHS.
3. Habitat for Endangered Species at Risk will be removed or otherwise impacted.
4. The site contains Key Hydrologic Features and Key Hydrologic Areas as defined by the Province; impacts to these resources are likely, particularly given the ultimate scale of infrastructure development (20 ha) to meet the County’s future requirements.
5. Invasive and/or predatory species are typically transported or attracted by recycling waste, based on the experience of established recycling centres. Introduction of such an infrastructure facility into a high-functioning area of the RNHS is clearly a high risk venture that will inevitably affect many sensitive plant and wildlife attributes.
6. Site studies to date have not adequately addressed ‘adjacent lands’ as defined under the PPS and its supporting documents. The waste facility will have effects capable of extending well beyond the minimum 120 m recommended in the Natural Heritage Reference Manual (2010).

7. The proposed facility will double as a waste handling and fleet maintenance facility. In our opinion the effects of traffic and emergency access cannot be adequately addressed without serious harm to the RNHS and its functions on the site and in its vicinity.
8. Although the proposed facility and access roads will occupy 5.5 ha, the County's "ONE SITE, ONE SOLUTION" study criteria include adequate space for a 20 ha facility as a basic requirement. Therefore significant cumulative effects are considered very likely once the initial facility is established.

Conclusions

We believe that the County's proposal to place this facility within the RNHS is not consistent with the Provincial Policy Statement or the RNHS policies within the Growth Plan. The area protected under the Greenbelt Plan (2017) may be extended in the future to cover this area of the Oro Moraine; Greenbelt Policy 4.2.1.2(h) would prohibit such a use.

We understand that MMA will be serving in a review capacity when Official Plan Amendments and re-zoning applications are put forward by the County and Township. We strongly recommend that the serious implications and precedents affecting the RNHS for the long term be carefully considered by the Province.

Sincerely,



Jim Dougan, BSc, MSc, OALA (Hon)
Director and Senior Ecologist

c.c. County of Simcoe
Township of Springwater
Friends of Simcoe Forests Inc.

2928 Horseshoe Valley Road West
Phelpston, Ontario
L0L 2K0
May 3, 2018

Premier Kathleen Wynne
Constituency Office
795 Eglinton Avenue East, Unit 101
TORONTO, Ontario
M4G 4E4

Dear Premier Wynne:

At lunch yesterday, I observed a televised report indicating that you have committed to expanding the Greenbelt in Ontario, should your party be re-elected as the Government of Ontario in the upcoming elections. On behalf of future generations of Ontarions, I commend you for your initiative in this matter.

However, I suspect you may not be fully aware of the actions of your Party's candidate in the Simcoe North riding, i.e. G. Marshall.

Mr. Marshall (the present Warden of Simcoe County) is spearheading efforts to re-zone the 207-acre "Freele Forest" (deemed a "Significant Woodland" and "Significant Wildlife Habitat" based on the Ontario Ministry of Natural Resources Ecoregion 6E criteria) from agricultural zoning to industrial zoning, to facilitate construction of a so-called "Environmental Resource Recovery Center" (ERRC) serving Simcoe County. That significant forest is located on top of the "Oro Moraine" which is within the Province's own "Regional Natural Heritage System" mapping that will form the basis of planning under the Growth Plan (2017) which came into effect July 1/17, and under the Greenbelt Plan (2017).

The Growth Plan (2017) Policy 4.2.3.1 prohibits such a use. The Greenbelt Plan (2017) Policy 4.2.1.2(h) prohibits such a use. The Greenbelt Plan also includes the following restriction, which would apply to the proposed forest site as the ERRC is to include an organics composting facility:

- **prohibiting new waste disposal sites and organic soil conditioning sites in key natural heritage features, key hydrologic features, and their associated vegetation protection zones**

Other existing industrial sites are readily available, one within 2 km of the Freele Forest and within 200 metres of the junction of 2 major thoroughfares. Those sites may be closer to the end market for the sorted waste material, and less expensive to develop than the extensive costs related to construction of new roadways, acceleration lanes and deceleration lanes, hydro lines, etc., etc. which will be associated with development of the proposed forest site. Comparative financial projections have not been offered to the taxpayers/ratepayers. Rather, stand-alone projections have been prepared which do not clearly support the financial advantages of the proposed site. A petition opposing this type of facility within any of our forests was signed by 1,300 voters of Simcoe County, with no response from Mr. Marshall's office.

Nowhere else in North America has such a facility been placed in the middle of a forest, partially in recognition of the regular occurrence of spontaneous combustion fires in each and every one of the existing facilities (witness the 6 fires in 8 years up to Oct 27/16 at the Wasteco Plant in Hamilton, and the fire at a waterfront facility in Toronto last fall, just to mention a few). Do we really want to risk a "Fort McMurray" situation by placing such a facility in the middle of any of our forests?

It is also noteworthy that the County's environmental consultants had failed to disclose the existence in that forest of 4 "Special Concern and Rare Wildlife Species", until after a local citizen's group spent its own funds to have a separate survey completed by a competent field scientist. Now, the County's plans have been amended to attempt "mitigation" of the negative impact of daily delivering 210 truckloads of garbage (i.e. 420 round trips) to the center of that forest, scheduled for 13 hours per day, 6 days per week. This, despite the Province's very specific Natural Heritage Policy 4.2.3. which clearly states:

“New development or site alteration will demonstrate that: i. There are no negative impacts on key natural heritage features or key hydrologic features or their functions.....”.

In short, mitigation is not an option.

With all of the foregoing in mind, can you tell me, where do you stand in this matter? I would have thought that Mr. Marshall, as one of your candidates in the upcoming election, would be supportive of the Liberal Party’s implementation of the Greenbelt Plan (2017). Yet, his actions are diametrically opposite to those espoused by yourself.

Your early response would be most appreciated.

Yours truly,

R.W. Wagner (Mr)

Thompson, Tiffany

From: Mary Wagner <yramrengaw@icloud.com>
Sent: Monday, April 23, 2018 10:25 AM
To: Daly, John; ERRC; Renee Chaperon
Cc: French, Bill; Allen, Don; Cindy & Randy Mercer; Heather Rutherford
Subject: updated ERRC studies
Attachments: Letter to FSF PJR and EIS JL Apr 19 Final.pdf

Dear Sir/Madam

Please include this email with attachments to the public record.

FSF Inc. submit for the public record the attached letter from our Environmental planner. Ms. Lawrence has reviewed the updated Planning Justification Report and EIS from the county website.

We respectfully request a copy of the correspondence between the County of Simcoe and the Province of Ontario that provides the county with exemption from section 4.2.3 of the GP.

We respectively request clarification from the County of Simcoe as to how the Forest Management Plan will allow for clearcut of the "Significant Woodland" growth directly on the ERRC footprint thus making this a temporary impediment to the ERRC.

Thank you for your time and consideration to this request.

Mary Wagner

April 19, 2018

Friends of Simcoe Forests Inc.
c/o Mrs. Mary Wagner
2928 Horseshoe Valley Road West
Phelpston, ON
L0L 2K0



Dear Mrs. Wagner:

**Re: County of Simcoe Environmental Resource Recovery Centre
County and Local Official Plan Amendment and Zoning By-Law Amendment
Files: SC-OPA-1602, OP-2016-005 and ZB-2016-021
2976 Horseshoe Valley Road West
Township of Springwater**

I have been retained by the Friends of Simcoe Forest Inc. to provide a land use planning opinion regarding planning applications that have been made by the County of Simcoe to site an Environmental Resource Recovery Centre in the Township of Springwater. The preferred site, as identified by the County of Simcoe, is located within the Freele Forest, a significant woodland.

As outlined in my letter of June 5, 2017, it is my opinion that there were planning errors made in the site selection process which has resulted in the identification of a preferred site that creates inherent conflicts with natural heritage planning policy at the Provincial, County and Local levels. With respect to documentation that has been submitted by the County in support of the current planning applications, neither the amended Planning Justification Report nor the amended Environmental Impact Study, have demonstrated conformity with the Provincial Policy Statement, County Official Plan, Springwater Official Plan or the Growth Plan.

In order to arrive at this conclusion, I have reviewed the following updated reports, prepared by the County of Simcoe, in support of the above noted applications:

- *Amended Planning Justification Report, Proposed Environmental Resource Recovery Centre, Township of Springwater, County of Simcoe, Ontario*, prepared by GHD, dated revised February 2018;
- *Amended Scoped Environmental Impact Study, Proposed Environmental Resource Recovery Center, Springwater, Ontario, County of Simcoe*, prepared by GHD, dated February 1, 2018

In preparing my professional opinion on the proposal, in addition to the documents listed on page 2 of my June 5, 2017 letter, I have also referenced the following additional documents as part of this more current review:

[p] 289.442.2829 [w] jlplanning.ca [e] jennifer@jlplanning.ca

8 Fieldgate Street Dundas ON L9H 6M6

- *Growth Plan 2017*; and,
- Growth Plan Natural Heritage System mapping, released by the Province February 9, 2018.

The amended ERRC documents were reviewed against comments that I provided in my June 5, 2017 letter. It is my understanding that this previous letter was shared with the County of Simcoe as part of their public consultation process.

I must reiterate at the outset, the site selection process remains part of the overall Official Plan Amendment (OPA) process and cannot be separated. The site selection process is essential background material and forms the basis for the preferred site that is being advanced in the OPA and Zoning By-Law Amendment (ZBLA) applications. The site selection process, although documented publicly, did not provide for any ability for the public to appeal the decision on the preferred site or the process whereby the preferred site was selected. It is only through this OPA and ZBLA process that the public have an opportunity to question and challenge the site selection process as well as the additional documents prepared in support of the OPA and ZBLA. If the site selection process had been undertaken as an Environmental Assessment, pursuant to the *Environmental Assessment Act*, the public would have had an opportunity to question and challenge the site selection decision-making framework through a formal appeal process, prior to the *Planning Act* applications for the site-specific ERRC. I continue to recommend that there are a number of flaws in the site screening process that continued to be carried through into subsequent stages of the site selection process that are not consistent with Provincial policy. This is even more important given that, according to Simcoe County, the Province has advised that the project is exempt from Growth Plan policy 4.2.3 which only permits infrastructure within the NHS if it has been approved through an environmental assessment (EA) process. Essentially, the Province appears to be accepting that the site selection process satisfies the rigorous requirements that would be expected of an EA process despite the fact that the site selection process had no formal appeal mechanism as would have been afforded the public through an EA. As such, I recommend that this letter be read in conjunction with my June 5, 2017 letter and that the Province be requested to advise how the site selection process met the EA process requirements.

Amended Planning Justification Report

The cover page notes that the study has been amended to address changes to policies contained within the Growth Plan, additional studies undertaken at the site and to address comments received from review agencies. Given the County's expressed interest in public consultation, I question why the cover page does not expressly note that the study was updated to also address comments received from the public. Unlike the amended EIS, the Planning Justification Report does not include a detailed comment/response matrix at the beginning of the document to identify specific comments received and how the report was amended to address those comments.

The updated report was issued prior to the Province releasing the final Natural Heritage System mapping for the Growth Plan. The report should be updated accordingly.

As outlined in my June 5, 2017 letter, my main concern relates to the fact that the Justification Report, as well as the Scoped EIS, erroneously interprets the Provincial Policy Statement (PPS) requirements related to no negative impact. Specifically, the PPS first requires that a proponent

demonstrate that a development or site alteration will have no negative impact on the natural heritage features or functions of an area. Only once they have demonstrated that the actual proposed development will not have a negative impact, can they move on to the next step which is mitigation. Unfortunately, the Planning Justification report relies on the EIS conclusion which erroneously incorporates mitigation into the decision-making associated with no negative impact creating a very clear distinction by using the term 'no **net** negative impact'. The Planning Justification Report repeats this erroneous interpretation of the PPS requirements in several locations, including the following statement on page 13 (Section 4.5):

*With the inclusion of afforestation areas, along with other forms of mitigation, it is anticipated that there would **be no net negative impact** on the significant woodland and significant wildlife habitat characteristics. (emphasis added)*

There is no provision for a proponent to demonstrate 'no **net** negative impacts' within the PPS. Rather, a proponent must first demonstrate 'no negative impacts' and only then can they propose mitigation. To include mitigation in the consideration of no negative impact is contrary to the PPS.

The Planning Justification Report only mentions significant woodlands, significant wildlife habitat and significant wetlands in their evaluation of Provincial, County and Local policy however, the significant habitat of endangered and threatened species has also been documented on the site and the Planning Justification Report should advise as to how the proposed development demonstrates no negative impact on these species or provide confirmation from the Ministry of Natural Resources and Forestry (MNR) that they have no concerns as it relates to the *Endangered Species Act*.

The Planning Justification Report, specifically as it relates to the impacts on natural heritage features and functions, has carried forward conclusions from the Amended Scoped EIS that, in my opinion, are not a correct interpretation of Provincial Policy and/or not a correct representation of the existing land use and management of the site. For example, in Section 4.5 of the Planning Justification Report, the following is stated:

From the site work and surveys undertaken for the EIS it was concluded that significant woodland was present in the study area. While the ERRC site did not exhibit uncommon woodland characteristics, the overall study area did contain significant woodland. The condition in part would be temporary with respect to the ERRC proposed location as this is comprised of a managed plantation.

There are a number of concerns with this statement. The concerning statement is first provided in *italics*, followed by my recommendation in normal font:

1. *EIS concludes that significant woodland was present in the study area.* The development envelope is within the study area and, therefore, is within significant woodland;
2. *EIS concludes that the ERRC site did not exhibit uncommon woodland characteristics.* The presence of uncommon woodland characteristics is one of only several characteristics that must be considered when determining the presence of significant woodland. Based on Item #1, GHD has concluded that the entire site, including the ERRC development footprint, is within a significant woodland. As such, the reference to no uncommon woodland characteristics is misleading and not necessary in this sentence.

3. *EIS concludes that the condition in part would be temporary with respect to the ERRC proposed location as it is comprised of a managed plantation. Although GHD does not define what they mean by 'the condition' I have assumed they mean that the significant woodland designation in the specific building envelope of the ERRC would be temporary because it is a managed forest. As noted in my previous letter, based on the County's documented approach to woodland management, the select removal/harvesting of trees in woodlands would not result in the area no longer being considered as significant woodland. The only way in which 'the condition' could be temporary would be if the County's woodland management strategy for the Freele Forest was that of clear cutting. As such, GHD's conclusion that a managed forest would result in the area not being considered significant woodland is not accurate.*

Section 3.1.1 (Site Description), 2nd paragraph, indicates that the proposed ERRC location was selected to address a number of considerations including avoidance of key natural heritage features such as wetlands. The subject property is now within the County's Greenlands designation and within the Growth Plan Natural Heritage System. Key natural heritage features in both plans include:

- Habitat of endangered species and threatened species;
- Fish habitat;
- Wetlands;
- Life science areas of natural and scientific interest;
- Significant valleylands;
- Significant woodlands;
- Significant wildlife habitat (including habitat of special concern species);
- Sand barrens, savannahs, tallgrass prairies and alvars.

It is unclear why the selection process only focused on avoiding one key natural heritage feature instead of all of them including significant woodlands, significant wildlife habitat and habitat of endangered species and threatened species.

Section 4.5 (PPS 2.1 – Natural Heritage), 1st paragraph speaks to PPS policies related to significant woodlands and significant wildlife habitat but neglects to mention habitat of endangered and threatened species. How has this been addressed?

Section 4.7 (PPS 2.3 – Agriculture), page 15, last sentence, states the following:

Clearly, based on the foregoing there is an identified need for the proposed facility as established by the Waste Management Strategy.

In my opinion, GHD has misinterpreted the requirement to demonstrate need within this policy. Specifically, PPS Policy 2.3 requires that a proponent demonstrate that there is an identified need within the planning horizon for additional land to be designated to accommodate the proposed use. While the Waste Management Strategy may have demonstrated a need for the ERRC, the Strategy did not demonstrate a need for additional land to be designated for non-agricultural uses within an agricultural area.

Section 5.3 (Section 4 -Protecting What is Valuable), refers to the draft Growth Plan Natural Heritage System. Although the mapping in the study area has not changed, the report should be updated to recognize that this mapping is now final and that the Growth Plan NHS policies now apply.

The last sentence on page 18 correctly notes that Section 4.2.3.1 of the Growth Plan restricts development within the NHS but provides an exception to activities that create or maintain infrastructure authorized under an EA process. GHD then indicates that the provincial staff have confirmed that, even though the ERRC did not go through an EA process, that the proposed facility is infrastructure authorized under an environmental assessment process and that therefore, the ERRC is exempt from the prohibition in Policy 4.2.3.1. As part of the transparent public process, I recommend that FSF request a copy of the correspondence from the Province that provides this confirmation and request that the Province provide the rationale for such an exemption given that the ERRC site selection process clearly did not take place within an EA process under the *Environmental Assessment Act*. This is concerning given that the County has repeatedly stated that the site selection process did not require an Environmental Assessment and, as noted in my previous letter, there were a number of concerns with the site selection that have been raised by the public that have not been addressed by the County.

Section 6.1 (County of Simcoe Official Plan – Greenlands Section 3.8), page 21, the report reiterates that the EIS has concluded that the development will not result in a negative impact and states the following:

This is based on the proposed location of the ERRC, the plantation history of the Site, the actively managed nature of the Study Area and the implementation of the recommended mitigation measures, which adequately avoid, compensate and replace natural features (i.e., vegetation / plantings) within the wider woodlot feature. The identified wetland and significant natural forest will be retained on the site.

Concerns related to the above statement include:

1. The proposed location of the ERRC is within a significant woodland, as documented by the EIS;
2. The plantation history of the site and the fact that it is managed using good forestry practices, does not remove the site from consideration as significant woodland, so these points are not relevant;
3. The statement is based on the notion that compensation and replacement of natural heritage features is contemplated by the PPS as part of the demonstration of no negative impact, which is not accurate;
4. Reference to replanting within the 'wider woodlot feature' is mentioned but there has been, to my knowledge, no study by the County to identify a publicly owned parcel that would be suitable to plant the necessary area to replicate the treed area lost through this proposal. Even if such an approach were supported by the PPS, which it is not, the proponent would need to demonstrate, through the EIS, that there is an appropriate location for the afforestation and the business plan would need to account for the cost of land acquisition, if necessary, planting and long-term maintenance;
5. Reference to 'significant natural forest' is not relevant. There is no such term in the PPS. The entire site has been deemed to be significant woodland, by the EIS.
6. This erroneous statement is repeated, in various forms, at least six times throughout the 38 page report.

Section 6.2 (County of Simcoe Official Plan – Resource Conservation Section 4.5), makes reference to a County policy that encourages the overall increase in the quantity of woodlands in the County. The previous EIS recommended a 2:1 replanting ratio which, if this was something that could be considered by the PPS, would represent an overall increase in the quantity of woodlands in the County over time. However, the Planning Justification Report is only recommending a 1:1 ratio whereas, the Amended EIS varies between recommending a 1:1 and a 2:1 replacement ratio. At a 1:1 replacement ratio, this would not be an increase in woodland quantity, as noted in County Policy 4.5, but rather a neutral area replacement. The County should be very clear on what planting ratio they are proposing. I question how the County will be required to implement this commitment? Would it be through a Holding zone, such that trees could not be removed until such time as the compensating area was planted?

Section 7 (Township of Springwater Official Plan), provides an overview of the Township's Official Plan policies. This section is concerning given that the County is aware that Springwater is updating their OP to be in-keeping with the PPS and County OP and that the current Springwater OP pre-dates the 2014 PPS, 2016 County OP and 2017 Growth Plan. Using out-dated designations and policies to justify the placement of the ERRC is concerning. At a minimum, if reference is to be made to Springwater OP policies, as pointed out in my previous letter, the author should acknowledge that, although the mapping does not identify the entire preferred site as Environmental Protection Category 2, based on the text description, it would qualify. For example, Category 2 lands are described in Policy 16.2.1.1(ii) as:

Lands delineated as Natural Heritage (Environmental Protection) - Category 2 Lands on Schedule 'B' include, but are not limited to, those environmentally significant lands and/or waters of ecological sensitivity, such as those areas containing the following natural features:

- Lands situated adjacent to provincially and locally significant wetlands and other Natural Heritage (Environmental Protection) - Category I Lands;
- **Unique and significant biologically sensitive wildlife habitat;**
- **Forests and Wood lots;**
- Natural connections through valley corridors or other linkages between core areas of the Natural Heritage System;
- Groundwater recharge and discharge, aquifer, and shoreline areas; and
- Natural Fish Habitat. (*emphasis added*)

In addition, it's possible that portions of the property could also be considered Category 1 lands which are described as follows in Policy 16.2.1.1(i):

Lands designated as Natural Heritage (Environmental Protection) Category 1 Lands on Schedule 'A' include environmentally significant lands and/or waters of inherent ecological sensitivity, such as those areas containing the following natural features (*emphasis added*):

- Internationally, **provincially, and locally significant wetlands** (Classes 1 - 7);
- Provincially significant Areas of Natural and Scientific Interest (A.N.S.I.s) or other combinations of habitat or landform which could be essential for scientific research or conservation education;
- **Significant portions of the habitat of threatened and endangered species;**

- Significant natural watercourses and ravines.

Section 11 (Recommendations Arising out of Planning Rationale), notes that tree replacement/compensation is a key recommendation that should be addressed in the consideration of the approvals of the applications. As noted earlier, even if the PPS permitted such consideration, which it does not, the proponent would be required to demonstrate, through the site selection process and EIS, that they have found and evaluated a site to provide the required size and characteristics to permit the tree planting to take place. Without this information, the proponent has not demonstrated that they can undertake the work that they have indicated is critical to their recommendation for approval. In addition, the report has not provided a planning mechanism to ensure that the compensation plantings take place in advance of any tree removal on the subject property. Without such a requirement, what planning mechanism would be used to enforce the compensation planting?

Amended Scoped Environmental Impact Study

There is a comment/response table included at the beginning of this study but the table only includes those comments that were provided by public agencies and do not include comments provided by the public. In keeping with the County's stated commitment to transparency, this table should be updated to include all comments received and the study team's response. A similar table, with all comments received and responses, should be included in all of the amended documents.

The amended EIS confirms that the subject property meets the definition of Significant Woodlands, Significant Wildlife Habitat and contains habitat of endangered and threatened species.

Table 2.1 (Secondary Source Information Reviewed), continues to list '*Freele County Forest management documents*'. A request was made, in FSF's previous letter to the County, for a copy of these documents. To date, it is my understanding that these documents have not been provided to FSF. Given that GHD appears to be relying on these documents, specifically as it relates to the previous and future anticipated management approaches to the Freele County Forest, it is essential that these documents be made public. Section 2.1.2 further describes forest inventory and stand health evaluations that were provided to GHD by the County. A copy of these reports should also be made public. It is my understanding FSF has retained experts to peer review these documents.

Section 2.2.2 (Natural Heritage Features), paragraph 4, refers to the 2015 Township of Springwater Official Plan (OP). I would defer to Springwater Township staff however, it is my understanding that the 2015 OP is an office consolidation and that the OP was actually approved in 1998 which pre-dates the 2014 Provincial Policy Statement. It is somewhat misleading to refer to a 2015 OP which could be read to suggest that the environmental protection policies are consistent with current policy requirements.

Section 2.2.3.1 (FODM5: Dry-Fresh Sugar Maple Naturalized Deciduous Plantation), I question whether this section should reference FOD5-1 as there is no FODM5 on Figure 4.

Section 2.2.3.2 (Flora), the text notes one-hundred and ninety-nine species were recorded however, the number in brackets indicates 197. This should be corrected.

Section 2.2.6.1 (Amphibian Surveys), notes that at Station 5, gray tree frog was recorded outside of the 100m survey station area. The direction that they were detected should be indicated since, if it was to the north, south or west, the frogs could have still been on the subject property.

Section 2.2.6.2 (Breeding Bird Surveys), paragraph 2, notes that, 'at Station 5, ovenbird was the only area sensitive species present; this is likely due to where the station is situated at the edge of the forest, adjacent to the road and an agricultural field'. I question whether this should be referring to Station 2 rather than Station 5 since Station 5 is in the interior of the site. This should be clarified.

Section 4.1 (Regulatory/Policy Framework - Township of Springwater), first paragraph, notes that Category 1 lands within the Springwater OP include PSWs, ANSIs, Species at Risk, and significant watercourses or ravines and that Category 2 lands include lands adjacent to Category 1 lands, unique and/or significant wildlife habitat, linkage features between core habitats, groundwater recharge areas and natural fish habitat. The second paragraph goes on to note that, since the Freele County Forest harbours several key components listed under Category 2, development within the forest must be subject to development requirements within the OP. This sentence should be revised to note that the Freele County Forest also includes several Category 1 components including assumed PSW and confirmed SAR.

Section 4.2 (Regulatory/Policy Framework – Simcoe County) provides a description of the OP designations but does not provide a planning analysis of the impacts of such policies. This should be updated.

Section 4.3 (Regulatory/Policy Framework – NVCA), final paragraph notes that the NVCA regulated areas are limited to the wetlands present in the northeast corner of the Study Area. Based on Figure 3 (Natural Heritage Features) there is an NVCA regulated wetland in the southeast corner as well. The text should be updated accordingly.

Section 4.4 (Species at Risk Legislation), 2nd paragraph includes the following sentence 'No ESA Threatened or Endangered species were directly observed within the Study Area during the course of this study, however, the acoustic surveys in 2017 identified use of this Study Area by SAR bat species.' Given that acoustic observations are often the only way to identify specific bat species, it is misleading to suggest that no threatened or endangered species were directly observed. This sentence should be revised.

Section 4.5.1 (Significant Woodland), 3rd paragraph, notes the following:

Therefore by size of the contiguous woodland feature, the minimum ecological functions criteria for interior forest size of 20 ha or more where forest cover is 60 percent or greater is satisfied, and Significant Woodland is by definition present within the Study Area. While this may be the initial limit for consideration of interior forest habitat, this feature is temporary as the proposed ERRC footprint is part of a managed and actively harvested woodlot.

As noted above in the Planning Justification Report review, the study team continues to perpetuate a false statement whereby they are suggesting that sustainable harvesting, which is the County's documented approach to forest management, would somehow result in the loss of interior forest habitat. As noted in my previous letter, the only way that interior forest habitat could be lost would be if the County's approach to harvesting was clear-cutting. It is evident in the

County's material related to their County forests, that clear cutting is not a method that they utilize when undertaking forest management. As such, the statement is erroneous and must be removed otherwise, the study team is misleading the reader.

Section 4.5.2 (Significant Wildlife Habitat), when speaking to animal movement corridors, notes that, '*although wildlife likely move along the trail within the Study Area....*'. I assume that wildlife is likely using the entire property for movement, not just the man-made trail. The wording should be revised appropriately.

Section 4.5.3 (Places to Grow), notes that, under Section 4.2.3 of the Growth Plan, outside settlement areas, development and site alteration is not permitted in key natural heritage features that are part of the Natural Heritage System. The study team goes on to state that there are certain exceptions to this provision related to forest management, flood and erosion control, infrastructure authorized under an environmental assessment process, mineral aggregates and agriculture. The section concludes that, since the proposed ERRC is defined as infrastructure under the Growth Plan definitions, it is exempt from the provisions of Section 4.2.3. While waste management systems are considered infrastructure as per the Growth Plan's definition, the exemption in Section 4.2.3.1 is only applicable if the infrastructure has been authorized under an EA process. This is a concerning statement by the study team given that the ERRC did not proceed through an EA process and numerous concerns have been raised, by the public, with the site selection process that have never been addressed by the County. If the Province is suggesting that the County can utilize the exemption policy under Section 4.2.3 of the Growth Plan, the Province should be required to explain how they have granted such an exemption given the lack of an EA process and the lack of clear and transparent decision making that led to the preferred site selection.

Section 5.1 (Impact Assessment Process), as outlined in my previous letter, one of the most concerning aspects of the EIS is that the study team is suggesting that tree planting off-site (i.e., mitigation) should be used when determining whether there is a negative impact to the features and functions on the site. Negative impacts must first be assessed based on the proposed development/site alteration. If no negative impacts are demonstrated, only then can mitigation be proposed. Mitigation cannot be used to demonstrate no negative impacts.

Table 5.1 (Ecosystem Component Impact and Mitigation Summary), I recommend that the overall area of impact is likely greater than 5.5ha as it has not included the area of impact associated with the relocated OFSC trail. This should be included in the impact assessment and mitigation. This would also apply to Section 5.2.1.

Section 5.2.2 (Mitigation) notes that afforestation efforts that will increase the available contiguous woodland vegetation by a minimum of 5.5 ha should take place within 5 km of the Study Area however, no specific areas are identified that the County owns or has access to for such tree planting. If land needs to be purchased to facilitate the tree planting, that must be included in the overall cost-benefit assessment for the project and should have been considered in the overall site selection process (as it could impact the viability of the project if an appropriate site cannot be found). In Section 5.3.2, it is noted that a minimum of 5.5 ha should be forested however, the study team indicates that 11 ha would be preferable. Section 6 (Conclusions) states '*a commitment to afforestation at a 2:1 ratio (e.g. 11ha) to expand and/or enhance the contiguous woodland feature within the vicinity of the Study Area will, along with the detailed site design and operation considerations, serve to mitigate the loss*'. It is unclear what GHD's professional recommendation to the County is with respect to the area, 5.5 ha or 11 ha and it is equally unclear as to what the County is committing to. Again, the availability of an appropriate 11 ha patch of

land has not been demonstrated and should have been part of the overall site selection and assessment process. If this project had been undertaken as an EA, such identification would have been a requirement during the assessment of alternatives.

Figure 5 (Wildlife and Habitat Features), the emergency access road should be shown on this figure.

Conclusion

Based on my review of the Amended Planning Justification Report and Amended Environmental Impact Study there remain outstanding issues with the contents of these reports, as outlined above. As part of an open and transparent public process, the County should provide responses to all comments received, not just those received from public agencies. I recommend that FSF request a written response from the County to all comments that have been submitted to date. If this process had been undertaken as an Environmental Assessment, such documentation would have been a requirement. I further recommend that FSF continue to request the Freele County Forest management documentation that is referred to in the EIS given that the study team is relying on this information in its determination of harvesting practices and woodland significance.

It is my opinion that neither report has demonstrated conformity with the Provincial Policy Statement, County Official Plan, Springwater Official Plan or the Growth Plan. This is based on the following:

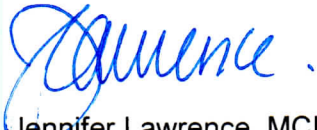
1. Both reports rely on correspondence that the County has reportedly received from the Province in which the Province advises that the ERRC is considered infrastructure that has been approved through an Environmental Assessment process and is therefore exempt from Growth Plan policy 4.2.3. This is extremely significant given that, if not for this exemption, the Growth Plan would not permit the ERRC on the subject property as it is outside of the Urban Area and within the Natural Heritage System. The site selection process was **not** completed as part of an Environmental Assessment and policy 4.2.3 does not provide for infrastructure to be approved through a process 'similar to an environmental assessment'. As such, I strongly recommend that FSF request a copy of the documentation from the Province that the County is referring to and further request that the Province document: (1) what ability they have to revise Growth Plan policy requirements that specifically requires an Environmental Assessment to obtain an exemption to a study that does not meet the standards of an Environmental Assessment; and, (2) to specify how the County's site selection process meets all of the requirements of an Environmental Assessment, including adequate and appropriate investigation into alternatives and preferred alternatives as well as an appropriate appeal process for the public specifically related to the site selection process. A copy of my June 5, 2017 letter should be provided to the Province which provides an outline of the concerns related to the site selection process. Until this documentation is provided, the proposed development appears to be contrary to Growth Plan policy 4.2.3;
2. Both reports rely on off-site compensation planting to demonstrate no negative impacts. Such an approach is not demonstrating '*no negative impacts*' but rather, is an attempt to demonstrate '*no net negative impacts*'. Such an approach is not supported by the Provincial Policy Statement. A proponent must first demonstrate that the proposed development and/or site alteration will not have a negative impact and, only once that is demonstrated, can the proponent recommend mitigation measures to ensure no negative impact takes place. Given that the proponent is relying on off-site compensation to offset the negative impact of the proposed development on the woodland, it is clear that the

development will result in a negative impact to the woodland which is not consistent with PPS policy 2.1.5;

3. Even if off-site compensation planting was consistent with Provincial policy, to address negative impacts of a development (which it is not), the County has not committed to a planting compensation ratio. The reports alternate between recommending a 1:1 ratio and a 2:1 ratio however, the County has not, to my knowledge, advised which planting ratio they are committed to achieving. In addition, the County has not identified a 5.5 ha – 11 ha vacant parcel of land, adjacent to a similar forested area as that which is being removed, within 5 km of the site (as recommended by the EIS), that is currently owned by the County and/or that the County has the ability to purchase. The County has also not included the cost of purchasing such a piece of land, reforesting 5.5 ha – 11 ha of that land and long-term maintenance costs into their business plan. Finally, the County has not committed to a specific planning mechanism that would ensure such compensation planting would take place prior to the removal of any trees on the subject property; and,
4. Both reports conclude that harvesting practices in the Freele County Forest results in the significant woodland designation being only a temporary condition. This is used to justify development within a significant woodland and to minimize the importance of the feature. Unless the County intended to clear-cut the Freele County Forest, a practice that is not supported by their own documented approaches to forest management, there would be no impact to the significance of the woodland as a result of sustainable harvesting. The reports should acknowledge that the woodland is significant with no qualifiers on this designation.

I trust the above is of assistance. Please let me know if you require anything further.

Yours truly,



Jennifer Lawrence, MCIP, RPP
President

Thompson, Tiffany

From: Mary Wagner <yramrengaw@hotmail.com>
Sent: Thursday, April 19, 2018 2:55 PM
To: ERRC
Cc: David Donnelly; Cindy & Randy Mercer; Heather Rutherford
Subject: request for information

Hello

I respectfully request to know the provincial staff that have consulted and determined that the proposed ERRC on this site is exempt from the prohibition 4.2.3.1.

I have spoken with MOECC district staff today, April 19th and they do not presently have a record of this consultaion.

Regards
Mary Wagner

Excerpt from the Amended Planning Justification Report:

The EIS also indicates the study area can meet criteria for significant wildlife habitat due to the potential for area sensitive birds, bat colonies, amphibian breeding and species of conservation concern.

Therefore the application of section 4.2.3.1 which restricts development subject to certain specific exceptions must be considered. The provisions of sub-section c) indicates that an exception applies

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to; “activities that create or maintain infrastructure authorized under an environmental assessment process”. It has been determined in consultation with the provincial staff that the proposed facility is infrastructure authorized under an environmental assessment process. Therefore, the proposed ERRC is exempt from the prohibition provided by 4.2.3.1.

March 5, 2018

Protecting Water Consultations
Ministry of Municipal Affairs and Housing
Local Government and Planning Policy Division
Provincial Planning Policy Branch
777 Bay Street, Floor 13
Toronto ON
M5G 2E5

Re: Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring
EBR Posting #013-1661

I am writing on behalf of the Friends of Simcoe Forests Inc. (FSF), a non-profit organization consisting of concerned citizens within Simcoe County, Ontario. Our long-term goal is to inform and unite people who are interested in the conservation of our County's forests. We encourage all local residents, visitors and friends of our environment to realize that they can enjoy the natural flora and fauna of the region, as well as the natural beauties of the forests within Simcoe County. As a group, we encourage beautification, preservation, and extension of parks and Green Belts. Through our mutual love and concern for the County's forests, we strive to make available all known statistical, scientific, horticultural and botanical information that positively impacts the future of our forests. It is our goal to promote the protection and appreciation of the environment and lands which are there for all of us and future generations to use and enjoy.

As an organization, FSF was thrilled to discover that the Province is considering an expansion to the Greenbelt Plan Area within Simcoe County (Oro Moraine – Study Area 4). While we understand that the Province's intention is to protect important water features, given the complex inter-relationship between ground and surface water and terrestrial features such as woodlands, we are confident that the protection of water resources will also assist in protecting the valuable woodlands within the Oro Moraine study area. As a result, we fully support the expansion of the Greenbelt Plan Area into Simcoe County.

The Province recently released the Growth Plan Natural Heritage System which identified a natural heritage system within Simcoe County. FSF appreciates the Provincial recognition of the important natural heritage features and functions that exist within Simcoe County and recommend that the next step is to protect these areas within a permanent Greenbelt Natural Heritage System. We recommend that the Province incorporate the Growth Plan Natural Heritage System, within Simcoe County, into the Greenbelt Plan Natural Heritage System.

FSF was formed in 2016 in response to a County proposal to construct a waste management facility within a significant woodland in Springwater Township. The preferred site that was selected by the County is currently the subject of a County and Local Official Plan Amendment (OPA) and Zoning By-Law Amendment application process. The Province (MMAH), as the approval authority for the County OPA, should be aware that the facility is proposed within the Growth Plan Natural Heritage System as well as within the Oro Moraine Study Area for Greenbelt Plan expansion. We trust that the Ministry will take this into consideration when reviewing the County OPA.

Thank you for the opportunity to provide input. Please keep us informed of any future public consultation opportunities.

Yours truly,

Mary Wagner
President
Friends of Simcoe Forests Inc.

April 16, 2018

Township of Springwater
County of Simcoe

Attention: Renee Chaperon, Town Clerk By E-mail: renee.chaperon@springwater.ca

Attention: John Daly, County Clerk By E-mail John.daly@simcoe.ca

Re: Applications OP-2016-001 and ZB-2016-002

A tree fallen across Rainbow Valley Road East last evening rendered the road completely unpassable. Families residing beyond the proposed ERRC emergency access route on Rainbow Valley Road East were unable to leave the area of their homes until this morning when the tree was cut and removed from the road through the efforts of local residents. Although this past weekend's storm was extreme, this type of occurrence in this heavily wooded area is not uncommon.



Tree blocking Rainbow Valley Road East, Springwater

Emergencies occur and this is something that needs to be planned and prepared for. Operating a high-risk, fire prone industrial facility in this area poses undue risk to the residents and invites the potential for multiple emergency situations that may require the evacuation of families from their homes.

It's my understanding that the families trapped during last night's storm have previously taken the initiative of raising concerns to both the Township of Springwater and the County of Simcoe in regards to a lack of **emergency response plans for residents** in the area of the proposed ERRC residing on dead end roads. Updated reports/studies recently released by the County still do not adequately address these legitimate concerns.

The County allocated in their plans to build the ERRC a secondary access route onto Rainbow Valley Road East to gain access to and from the facility in case of emergencies. In the case of last evening, a total of six families that reside beyond the proposed ERRC entrance were unable to leave their homes and exit the area for an extended length of time. ***Why has the County not allocated in their plans a secondary access route for residents to evacuate the area in case of emergency?***

We are informing the Township of Springwater and The County of Simcoe by way of this letter that they are on notice and will be fully responsible for their negligence should they proceed with plans to build the EERC in the Freele Tract.

Best Regards,
Cindy Mercer

Springwater, On.

Cc: errc@simcoe.ca

Cc: don.allen@springwater.ca

Cc: bill.french@springwater.ca