



May 8, 2017

Mr. John Daly, County Clerk By email john.daly@simcoe.ca
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, ON
L9N 1X6

Dear Mr. Daly;

Re: Part Lot 2, Concession 1, 2976 Horseshoe Valley Road West, Township of Springwater, Environmental Resource Recovery Centre, County File: SC-OPA-1602

AWARE Simcoe strongly supports the intent of the County to build an Environmental Resource Recovery Centre to process our organic and recycling materials. We feel this demonstrates Simcoe County's commitment to providing leadership in waste reduction.

AWARE Simcoe made a submission (attached below) to the site selection process recommending that the site at 540/528 Penetanguishene Road, Springwater be selected.

However, we feel that this new environmental facility should be showcased to the world in a visible and central location and not hidden back in the bush on lands which should remain protected greenlands. We do not believe that using County forest for such an industrial use is appropriate and therefore we urge County Council to reconsider the choice of 2976 Horseshoe Valley Road as the chosen site.

Please notify us of the decision.

Sincerely,

Don Morgan, Chair
AWARE Simcoe,
aware.simcoe@gmail.com



Comments on Simcoe
County OPF.pdf

Draft Comments on Simcoe County OPF/MMF Site Selection, November 1, 2015

AWARE Simcoe is pleased to submit comments on the Site selection process for the Organics Processing Facility and Materials Management Facility. We see these new facilities as a necessary step in the progression toward a zero waste economy in Simcoe County. This is a great opportunity for the County to be at the forefront of waste reduction activities provincially, nationally and even internationally and to be a showcase for Zero Waste Management Techniques.

AWARE Simcoe recommends the site located at 540/528 Penetanguishene Road, Springwater for the following reasons:

Proximity to Major Roads

The location is virtually adjacent to Highways 11, 400 and 93. Trucks can travel on provincial highways via 400 and 11 from both ends of the County and on County roads from other areas. Other than the required improvements to the entrance to the property there are few road improvements necessary.

No doubt these facilities will be of great interest to other municipalities, the waste reduction industry, schools and the general public. Tours will be in high demand. This location is conveniently accessible to the public.

Proximity to Barrie

Eventual inclusion of the City of Barrie organics and recycling materials into the Simcoe County program seems obvious and inevitable. Locating these facilities in close proximity to the largest urban area in the County makes long term sense.

Buffered on 3 sides

This site has very few residences nearby and is buffered on three sides by Hwy 11, Hwy 93 and the open area to the south (which we believe is zoned EP). The north side is bordered by the church which is an institutional use, not residential. The Napoleon manufacturing plant and warehouse nearby are already similar industrial uses.

Opportunity to partner with Georgian College and other Groups in Research Activities

The main campus of Georgian College is only a few kilometers away in Barrie. This offers a great opportunity to partner with GC to do research into alternative materials for making products and packaging which can be easily and completely recycled.

Likewise, this location can be used to do research into uses for the finished compost materials such as urban gardens and soil amendments, in partnership with agricultural groups such as Simcoe County Federation of Agriculture, Christian Farmers Federation of Ontario, Food Partners Alliance and urban garden groups.

How to turn the Negative Factors for the Site into Positive Attributes

More than half the property is Canada Land Inventory Soil Class 1-3. Farmland is a valuable resource. This land appears not to be farmed currently.

Topsoil will have to be stripped from the footprint area for the OPF and MMF. This topsoil can be used to create urban gardens in cooperation with the urban garden groups in the County and Barrie. The rest of the Class 1-3 land area could be utilized to demonstrate various crop production techniques in partnership with SCFA, CFFO, local urban garden groups and Food Partners Alliance.

A small band on the south end of the property is designated as Medium Vulnerability Groundwater Recharge. The southern end of the property can be used to demonstrate Low Impact Development (LID) groundwater recharge techniques in partnership with NVCA and Georgian College.

Other portions of the buffer zone areas could be used by the Simcoe County Forestry Department to demonstrate various forestry management and planting techniques, especially the north and south ends of the property.

Solar Energy Demonstration

Of course the rooves of the OPF and MMF buildings are the perfect location for solar arrays. Perhaps they can produce enough power to run the facilities.

Recommendation

This location offers the opportunity for Simcoe County to provide a showcase for multiple facets of sustainable living and land management going into the twenty first century.

For all the above reasons AWARE Simcoe supports the location of the OPF and MMF at the 540/528 Penetanguishene Road candidate site.

May 2, 2017

Mr. John Daly, County Clerk
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, ON
L9N 1X6



Dear Mr. Daly,

**Re: Proposed County Official Plan Amendment
Part Lot 2, Concession 1
2976 Horseshoe Valley Road West
Township of Springwater
Environmental Resource Recovery Centre
County File: SC-OPA-1602**

The Friends of Simcoe Forests Inc. is a community group formed by citizens of Simcoe County, and beyond, that share a common concern. We are concerned that the County of Simcoe legacy that valued forests, natural heritage sites and significant wildlife habitat has been abandoned.

The County Official Plan does not accommodate placement of a waste management facility in a forest. The present county staff and council choose to disregard the protection and value afforded the forest by generations of former elected officials. The present county staff and council plan to disregard the foresight of their predecessors and amend the Official Plan to permit the destruction of our woodlands. This unprecedented action will start the unravelling of decades of commitment and work to preserve our greenland and natural heritage.

We are opposed to the proposed amendment.

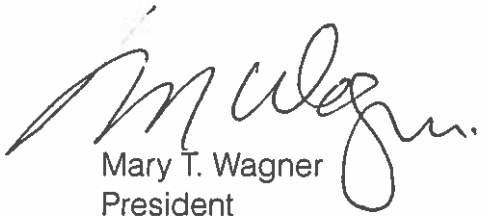
County Forests should not be considered as a viable option for the construction of infrastructure and should have been excluded from the site selection process based on both natural heritage as well as social and cultural impacts to the broader community. Industrial land does exist and is available within the county. Industrial land is appropriately serviced and zoned for this type of facility.

Based on the above, we would ask that the County not approve the proposed Official Plan Amendment.

Please find attached, for inclusion in our submission, letters from our Ecological Consulting Firm and our Planner.

I would like to be notified of the adoption or refusal of the proposed Official Plan Amendment.

Yours truly,

A handwritten signature in black ink, appearing to read "M. Wagner". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Mary T. Wagner
President
Friends of Simcoe Forests Inc.



DOUGAN ASSOCIATES

ECOLOGICAL CONSULTING & DESIGN

77 Wyndham Street South • Guelph, ON, N1E 5K1 • T 519.822.1609 • F 519.822.5589 • www.dougan.ca

April 28, 2017

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

**Re: Preliminary Peer Review of Scoped Environmental Impact Study (GHD Ltd),
Proposed Environmental Resource Recovery Center, Springwater, Ontario**

Dear Mr. and Mrs. Wagner:

Dougan & Associates (D&A) was retained by Friends of Simcoe Forests Inc. in March 2017 to complete a peer review of the terrestrial resources information contained within the report *Scoped Environmental Impact Study, Proposed Environmental Resource Recovery Center, Springwater, Ontario* prepared by GHD Ltd. (November 17, 2016).

The peer review applies Dougan & Associates standard approach for reviews of natural heritage planning reports, which focuses on whether the EIS adequately reflects relevant protocols and interpretation as required under the Provincial Policy Statement (OMMAH 2014) and its guiding documents, such as the Natural Heritage Reference Manual 2nd Ed. (OMNR 2010), Significant Wildlife Habitat Technical Guide (OMNR 2000), and other provincial references, as well as the Simcoe County Official Plan (2007) and other local documents, including the Simcoe County Forest Plan (2011) and the Simcoe County ONE SITE – ONE SOLUTION (2016) document.

GOALS AND OBJECTIVES OF SCOPED ENVIRONMENTAL IMPACT STUDY

Goals and objectives for in the EIS report are not clearly stated is a stand-alone report section. In Section 1.1 Introduction, the GHD goal is "...to complete a *Scoped Environmental Impact Study (Scoped EIS)* for the proposed co-located development of a *Materials Management Facility (MMF)*, an *Organics Processing Facility (OPF)*, and related support activities, collectively referred to as the *Environmental Resource Recovery Centre (ERRC)*." Two inferred objectives include "...to include an evaluation of all relevant natural features and species within the Study Area." and "This report has been prepared to address the requirements stipulated in the Simcoe County OP to satisfy the requirements of Provincial and County OP policies, as well as other relevant legislation."

MAJOR COMMENTS

In our preliminary review of the EIS document, D&A identified the following major inadequacies and/or inconsistencies in the report:

1. Significant Wildlife Habitat (SWH)

SWH is protected under the Provincial Policy Statement (OMMAH 2014). Based on the data provided by GHD, the site meets criteria for several more SWH categories than are indicated in the EIS, and there are some weaknesses in the data required to assess SWH. Specifically:

- Amphibian data in the EIS is incomplete to assess SWH status (call levels and weather conditions required);
- Spotted Salamander egg masses were found, Amphibian Breeding Habitat (Woodland) may therefore be present;
- Presence of Western Chorus Frog (an S3 provincially ranked species) triggers SWH;
- Twenty-one (21) area-sensitive bird species were documented, and SWH designation as Woodland Area-Sensitive Bird Breeding Habitat may therefore apply;
- Woodland Raptor Nesting Habitat may be present; no raptor nest surveys were conducted; and
- The EIS opines incorrectly that cultural plantations cannot qualify as SWH; in fact, they are specifically identified as potential SWH (for raptor nesting).

The ERRC will cause fragmentation of the forest patch where it is proposed; the EIS does not adequately address the impact on both quantity and quality of forest interior habitat on the site.

2. Significant Woodlands

The report notes that the site qualifies as Significant Woodland but the implications of this designation are not brought forward into the impact assessment. The EIS downplays the value of the Significant Woodland without speaking to functional attributes which underlie the concept of "significance" as defined under the PPS. The presence of a diverse group of area-sensitive forest bird species (21 species based on MNRF criteria), and other SWH indicates that this is currently highly functioning habitat irrespective of the presence of planted conifers.

3. Species at Risk (SAR)

Species at Risk findings and impact assessment are insufficient. No systematic bat surveys were conducted although up to three Endangered bat species could be present. The Executive Summary of the EIS states that no SAR are present, but this is incorrect as several Special Concern species are present and discussed elsewhere in the EIS.

4. Impacts to Biodiversity

The facility will handle compostable waste, which would include invasive plant species and pests affiliated with waste materials, that may affect the biodiversity of the surrounding forest. Effects on local wildlife will likely include increases in species such as raccoons, which are predatory on ground-nesting birds (which represent 20% of the interior species documented). Forest interior habitat will be converted to edge; forest edge birds include nest predators. These effects are neither identified nor discussed in the EIS; they will likely have long term implications within connected woodlands beyond the site.

5. Adjacent Lands

There is no clear discussion in the EIS of Adjacent Lands, defined as the area 120 metres beyond the limits of development. The proposed facility will create changes to ecological functions on a much larger footprint, likely in the order of 200+ m, and with potential for further impacts due to future expansion.

6. Vehicular Impacts of Facility

The EIS does not adequately address the road and traffic impacts of the facility. The required internal road system for the facility includes the main entrance road, and an emergency access route which will be placed along an existing trail to the north of the facility. EIS Section 3 (Preliminary Development Plan) indicates that the site will also be a *"Truck Servicing Facility – a location for servicing the County's fleet of industrial Solid Waste Management vehicles."* Vehicular traffic, including waste management trucks as well as private vehicles engaged in drop-offs, will undoubtedly generate heavy traffic loads; these are not discussed in the EIS. The Facility Characteristics Report (GHD 2016a) for this site states that the clearing width for the access road will be 15 – 20m (not including allowances for turn lanes), however this clearing is also not addressed in the EIS.

7. Inadequate Details on Site Plan

The EIS does not include a site concept plan which allows a clear understanding of the proposed development; the EIS does not include any graphic representation of the project apart from the generic mapping of a development footprint shown on Figures 4 and 5. There is no discussion of potential grading requirements to attain a level base for the facility, and for the road access. There is no Mitigation Plan included with the EIS, which would normally include existing ecological features and functions (e.g. SWH extent, including buffers) overlaid on the development concept plan, and also indicating the locations for mitigation measures proposed for the development site or adjoining lands.

8. Cumulative Effects

The EIS does not address potential cumulative effects. EIS Section 3 (Preliminary Development Plan) indicates that the facility may be expanded in the future; the EIS considers a 4.5 ha development site, however the County's *"ONE SITE, ONE SOLUTION"* (2016) document identifies the size specification as 20 ha, and also promotes this preferred site on the basis of its size (207 ac) described as "large usable space", accommodating potential expansion. Given the high likelihood of expansion, and the constraints identified outside of the proposed 4.5 ha development site, cumulative effects are likely but are not identified, discussed or addressed in the EIS.

Other concerns regarding the EIS will be provided at a later date. We understand that Friends of Simcoe Forests Inc. has also retained a planner, Jennifer Lawrence, who is providing comments on the planning aspects of the project under separate cover.

CONCLUSION

Based on this review, D&A believes that the GHD *Scoped EIS* does not adequately characterize the study area, provide appropriate interpretation of policy, or discuss impacts and mitigation in sufficient detail. Figures lack sufficient detail on the proposed development, policy constraints, impacts, and mitigation.

LIMITATION

The opinions in this letter report document are based on the *Scoped Environmental Impact Study, Proposed Environmental Resource Recovery Center, Springwater, Ontario* (GHD Ltd., November 17, 2016), and other documents referenced; opinions are subject to modification if new or revised documents are provided.

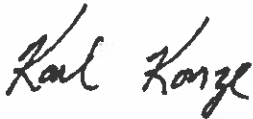
Sincerely,



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



Mary Anne Young, BLA, OALA, ISA
Landscape Architect, Arborist, Ecologist



Karl Konze, B.Sc.
Senior Wildlife Ecologist

References

- GHD. 2016a.** County of Simcoe Environmental Resource Recovery Center Facility Characteristics Report. Prepared for the County of Simcoe. 35 pp. + Figures, Tables & Appendices.
- GHD. 2016b.** Scoped Environmental Impact Study [for the] Proposed Environmental Resource Recovery Center. Springwater, Ontario. Prepared for the County of Simcoe. 26 pp. + Figures, Tables & Appendices.
- OMMAH (Ontario Ministry of Municipal Affairs & Housing). 2014.** Provincial Policy Statement. 50 pp. Available at: <http://www.mah.gov.on.ca/AssetFactory.aspx?did=10463>
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- OMNR (Ontario Ministry of Natural Resources). 2010.** Natural Heritage Reference Manual. Available at: <http://www.mnr.gov.on.ca/stdprodconsume/groups/lr/@mnr/@lueps/documents/document/289522.pdf>
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- Simcoe County, 2007.** Official Plan of the County of Simcoe – Consolidated April 2007. County of Simcoe. Available online at: <http://www.simcoe.ca/dpt/pln/official-plan>
- Simcoe County, 2011.** Simcoe County Forests 2011 – 2030. Available online at: <http://www.simcoe.ca/Forestry/Documents/SCF%20final%20report.pdf>
- Simcoe County. 2016.** ONE SITE- ONE SOLUTION. Available online at: http://www.simcoe.ca/SolidWasteManagement/Documents/One%20site%20one%20solution_FAQ_final.pdf
- Simcoe County. 2017.** Environmental Resource Recovery Centre – 2976 Horseshoe Valley Road West, Springwater. GET THE FACTS. January 2017. Available at: <http://www.simcoe.ca/SolidWasteManagement/Documents/FAQs%20-%20January%202017.pdf>
- Township of Springwater, 2015.** 1998 Official Plan – Consolidated October 2015. Township of Springwater. Available online at: <http://www.springwater.ca/cms/One.aspx?portalId=312&pageId=4265#officialplan>

April 28, 2017

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
Regional 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 reviewed the following reports, prepared by the County of Simcoe, in support of the above noted applications:

- *County of Simcoe Materials Management Facility, Part 1 – Planning – Siting Methodology and Evaluation Criteria*, prepared by Conestoga-Rovers & Associates, dated February 2015;
- *County of Simcoe Organics Processing Facility, Part 1 – Planning – Siting Methodology and Evaluation Criteria*, prepared by Conestoga-Rovers & Associates, dated February 2015,
- *County of Simcoe – Materials Management Facility, Part 2 – Long List Evaluation*, prepared by GHD, dated July 12, 2015;
- *County of Simcoe – Organics Processing Facility, Part 2 – Long List Evaluation*, prepared by GHD, dated July 23, 2015;
- *County of Simcoe Organics Processing Facility, Materials Management Facility and Co-Located Facility, Part 3 – Short List Evaluation*, prepared by GHD, dated February 26, 2016;
- *Scoped Environmental Impact Study, Proposed Environmental Resource Recovery Center, Springwater, Ontario*, prepared by GHD, dated November 17, 2016;
- *Planning Justification Report, Proposed Environmental Resource Recovery Center, Springwater, Ontario*, prepared by GHD, dated November 17, 2016;
- *Agricultural Impact Assessment Report*, prepared by AgPlan, dated November 16, 2016;
- *Environmental Resource Recovery Centre 'Get the Facts', 2976 Horseshoe Valley Road West, Springwater, County of Simcoe, September 2016;*
- *County of Simcoe Environmental Resource Recovery Centre, Summary of Consultation and Notification (to December 2016); and,*

- Neighbourhood Landowner Meeting, Final Meeting Notes and Follow-Up, Thursday September 8, 2016.

In preparing my professional opinion on the proposal, I have also referenced the following documents:

- *Planning Act and Provincial Policy Statement (2014)*
- *Environmental Assessment Act, Ontario Regulation 101/07 and the Guide to Environmental Assessment Requirements for Waste Management Projects*
- *Simcoe County Official Plan (2016)*
- *Springwater Official Plan (1998) and Comprehensive Zoning By-Law (2004)*
- *Ministry of Environment and Climate Change Statement of Environmental Values*
- *Simcoe County Forests 2011-2030*
- *Guidelines for the Siting and Operation of Waste Transfer Stations*, Nova Scotia Environment and Labour, 2006
- *Environmental Standards for Municipal Solid Waste Transfer Stations / Local Waste Management Facilities, Guidance Document*, Newfoundland and Labrador, 2010
- *Waste Transfer Stations: A Manual for Decision-Making*, United States Environmental Protection Agency, 2002
- Letter to Friends of Simcoe Forests Inc., prepared by Dougan and Associates Inc., dated April 28, 2017; and,
- Letter to County of Simcoe from Nottawasaga Valley Conservation Authority, dated March 2, 2017, NVCA ID #30106

I will be able to provide more detailed comments shortly however, in an effort to provide the Friends of Simcoe Forests Inc. with comments to submit to the County in advance of their Public Meeting on May 9, 2017, I have prepared the following summary letter.

Overview

In 2010, the County of Simcoe approved a Solid Waste Management Strategy. Within that strategy, it was recommended that the County assess the development of a central composting facility as well as assess the long-term requirements for collection and processing of organics and recycling and waste export. The Strategy further recommended that consideration be given to developing a transfer station type facility. In August 2014, County Council endorsed Conestoga-Rovers & Associates (CRA) to determine an optimal site for a transfer facility, referred to as a Material Management Facility (MMF) as well as an Organics Processing Facility (OPF). The siting for these two facilities began as independent searches with specific, but similar, siting criteria. The methodology and evaluation criteria for siting the MMF and OPF is outlined in the CRA reports entitled *County of Simcoe Materials Management Facility, Part 1 – Planning – Siting Methodology and Evaluation Criteria* (February 2015) and the *County of Simcoe Organics Processing Facility, Part 1 – Planning – Siting Methodology and Evaluation Criteria* (February 2015), respectively. The purpose of the Part 1 studies was the same for both the OPF and the MMF; that is, the Part 1 study was to establish the framework for how the potential sites would be identified and evaluated by defining the search area, identifying a comprehensive list of candidate sites (including County-owned and privately owned sites) and establishing a series of criteria to screen

and evaluate potential sites. The Part 1 study created a list of exclusionary criteria that would be used to screen the comprehensive list of candidate sites. These exclusionary criteria are referred to as Screen 1. Screen 1 was applied to arrive at a long list of sites which would then be screened against a second set of criteria referred to as Screen 2.

The next set of reports are the Part 2 – Long List Evaluations for the MMF and OPF, prepared by GHD (formerly CRA), dated July 12 and July 23, 2015, respectively. The Part 2 reports include the Screen 2 criteria that were used to create a short list of sites which were then vetted through the final screen, referred to as Screen 3.

The final report associated with the siting process is the *Part 3 – Organics Processing Facility, Materials Management Facility and Co-Located Facility Short List Evaluation*, prepared by GHD dated February 26, 2016. This report combines the OPF and MMF selection process into one document and evaluates the short list of properties, identified in the respective Part 2 reports, to determine whether it is appropriate to continue siting these facilities independently or whether it would be appropriate to co-locate the two facilities on one site. Screen 3 was applied to the short-listed sites and each were subjected to a comparative evaluation process to identify a preferred location that has an appropriate balance of strengths (advantages) and weaknesses (disadvantages) and evaluated to determine how well the site satisfies the goals and objectives of the project. Of note, the comparative evaluation did not include site-specific Environmental Impact Studies for each site to determine whether they could meet the federal, provincial, County and local natural heritage policies. Rather, this evaluation was deferred until the preferred site was selected. A preferred location for the co-located site is identified in the Part 3 report as 2976 Horseshoe Valley Road in Springwater, a wooded parcel known as the Freele County Forest (Tract). In addition to the OPF and MMF, the preferred site is also intended to include a Solid Waste Management truck servicing area, a public education area and the potential for future expansion to include a recycling sorting facility. These additional uses were not noted in either the Part 1 or Part 2 reports.

The preferred site is within the Greenlands designation of the current County of Simcoe Official Plan. Waste disposal sites are not a permitted use within the Greenlands designation so the County has initiated an Official Plan Amendment (SC-OPA-1602). The proposed amendment is as follows:

- Modifying Schedule 5.6.1 by (a) renaming Schedule 5.6.1 "County Waste Disposal Sites" to Schedule 5.6.1 "County Waste Management System"; (b) adding Environmental Resource Recovery Centre to the legend; and, (c) adding a symbol for Environmental Resource Recovery Centre to the Schedule within Part Lot 2 Concession 1 Springwater Township.
- The addition of the following Section and text after Section 4.9.17:

*Section 4.9.18, Environmental Resource Recovery Centre
Part of Lot 2, Concession 1, Springwater (2976 Horseshoe Valley Road)*

Permitted uses on a portion of Part of Lot 2, Concession 1, Springwater Township (2976 Horseshoe Valley Road) as identified on Schedule 5.6.1 as Environmental Resource

Recovery Centre shall include facilities for the purpose of the consolidation and transfer of various waste streams such as organics, recyclable materials and non-hazardous household garbage, processing of organic green bin materials under controlled conditions for conversion into other materials. Other ancillary uses would include a public education area, truck maintenance and servicing area and facility administration area. The temporary storage of waste is permitted on the lands but no permanent disposal of waste materials or landfilling of any kind is permitted within the lands subject to Section 4.9.18.

The County has also submitted applications to the Township of Springwater for an Official Plan and Zoning By-Law Amendment (OP-2016-005 and ZB-2016-021). Within the Springwater OP, the site is designated Rural and Agriculture on Schedule A-2 and Environmental Protection Category 2 on Schedule B. Section 2.20.4 of the Springwater OP requires that the establishment of new waste disposal sites shall require an amendment to the OP. The property is zoned "A" Agriculture in the Springwater By-law 5000. The Agricultural zone does not permit waste disposal sites which has triggered the need for a Zoning By-Law Amendment.

In addition to the three site selection reports, supporting documentation has been prepared for the proposed preferred site as part of the Official Plan and Zoning By-Law Amendment applications. These include a Scoped Environmental Impact Study, Planning Justification Report, Agricultural Impact Assessment and Hydrogeological Assessment.

Site Selection Process

The following is a summary of concerns with respect to the Part 1-3 documents:

1. The documents do not contain sufficient reference to the *Planning Act* and Provincial Policy Statement (PPS). The Screen 1 Evaluation Criteria should have, at a minimum, included the avoidance of the habitat of endangered species and threatened species. Without this criterion, the Screen 1 evaluation is not consistent with the PPS. In addition, Screen 1 Evaluation Criteria could have taken a conservative, and best practices, approach and eliminated all sites within the Council approved Greenlands designation from the list of candidate sites;
2. Sites with natural heritage features (such as County Forests) were allowed to advance to Screen 2 based on additional environmental screening taking place at that stage however, Screen 2 evaluation criteria includes no specific reference to any natural heritage features;
3. When establishing evaluation criteria, reference is made to technical documents from other Provinces and the United States with no clear reference to technical documents created pursuant to the PPS for evaluating impacts to natural heritage features and functions, such as the Ministry of Natural Resources and Forestry (MNR) *Natural Heritage Reference Manual 2nd Edition* (2010) and the MNR *Significant Wildlife Habitat Technical Guide* (2000) both prepared in support of the PPS Natural Heritage policies;
4. Screen 3 evaluation criteria refer to demonstrating 'no net effects' on the environment which is not the same as the 'no negative impact' test established by the PPS. As such, the Screen 3 evaluation is not consistent with the policy requirements of the PPS, County of Simcoe OP and Springwater OP;
5. The County's stated preference for finding a site that is already owned by the County resulted in the inclusion of County-owned forests in the site selection process. 82.5% of

- the County-owned sites that are included in the candidate sites are County Forests and 50% of all the candidate sites are County Forests;
6. After Screen 1 is applied, 70% of the MMF long-list sites are County Forests and 77% of the OPF long-list sites are County Forests. After Screen 2 is applied, 4 out of 5 of the MMF short-list sites are County Forests (80%) and 5 out of 7 of the OPF short-list sites are County Forests (71%). The preponderance of County Forests in the list of candidate sites, the lack of consideration for natural heritage features such as habitat of endangered and threatened species, significant woodlands and significant wildlife habitat as exclusionary criteria in the Screen 1 and 2 stages and the consideration of 'no net effect' rather than the PPS requirement of 'no negative impact' has led to the identification of a short-list of sites that may not be consistent with the PPS, County and Local OP policies;
 7. The County is relying on the out-of-date Springwater OP and zoning designations whereas they would be aware that the OP and Zoning By-Law will need to be brought into conformance with the County OP thereby resulting in the County Forests having a Greenlands designation at the local level;
 8. The Springwater OP policies would suggest that the County Forest sites would, at a minimum, meet the Natural Heritage (Environmental Protection) Category 2 criteria however, the mapping has not been updated;
 9. The Part 3 report concludes that co-locating the facilities is appropriate, contrary to a staff recommendation made earlier in the process. The issues and concerns raised by staff previously, in relation to a co-located facility, have not been addressed in the report;
 10. The Part 3 report introduces additional uses to the site (truck maintenance facility, public education area, potential future expansion/recycling sorting facility) that were not considered during the Part 1 and 2 reports; and,
 11. At a minimum, 72% of the written comments received from the public, as documented in the Part 3 report, requested that the County not consider the placement of these facilities within natural areas and, more specifically, not within County Forests. In addition, a total of 1,320 signatures were collected on petitions speaking out against the use of several of the County Forests under consideration in the short-list evaluation. The report does not provide sufficient discussion with respect to how the County considered these numerous and valid concerns throughout the site selection process.

In my opinion, for the siting methodology and evaluation criteria to be consistent with the PPS, and to be transparent as a decision-making tool, the reports should have included substantial discussion and reference to the *Planning Act* and the relevant PPS policies. In addition, to be consistent with the PPS, Screen 1 exclusionary criteria should have been to, at a minimum, avoid the habitat of endangered and threatened species, in addition to Provincially Significant Wetlands and floodplains. However, in addition to those exclusionary criteria, given: (1) the screening size criteria of the two facilities, including facility and buffer (OPF 13ha; MMF 7ha); (2) the purported reliance on the MOECC SEV; (3) the four principles upon which the siting and development of the facilities are to be based on; and, (4) the PPS natural heritage requirements, it would seem reasonable to assume, in an effort to be conservative, that a facility of the anticipated size(s) would likely not be able to be constructed within an area of natural heritage significance without having a negative impact on the natural features or their ecological functions. As such, to be conservative, and to follow best practices of other municipalities, it would have been appropriate to eliminate any sites meeting these criteria, through Screen 1. Alternatively, if the County wanted to keep their options open with respect to undertaking additional environmental evaluations (as

provided for in PPS Policy 2.1.5), certain natural heritage features could have been included in the evaluation criteria and, if properties passed all other exclusionary criteria, the property could have been carried forward to the Part 2 study for further consideration and closer and more detailed environmental evaluation. However, this additional evaluation during the Part 2 study would need to include natural heritage features and functions related specifically to significant woodlands, significant wildlife habitat, fish habitat, significant valleylands and areas of natural and scientific interest, something that was not done as part of this process.

Proposed Preferred Site - Site Specific Studies

Scoped Environmental Impact Study, GHD, November 17, 2016

The purpose of the Scoped Environmental Impact Study (EIS) is to evaluate the proposed Environmental Resource Recovery Centre (formerly OPF/MMF) at 2976 Horseshoe Valley Road against the PPS requirements related to natural heritage and water. As this is mainly an ecological analysis, I will defer most the review to Dougan and Associates and rely on their professional opinion with respect to whether the fieldwork and analysis has demonstrated no negative impact to the following: Provincially Significant Wetlands, habitat of endangered and threatened species, significant woodlands, significant wildlife habitat, significant valleylands, significant areas of natural and scientific interest and fish habitat. My review relates to the policy context of the assessment as well as some of the assumptions/conclusions that were drawn before and during the assessment.

Section 2 (Existing Conditions, Natural Features and Resources), Table 2.1 lists Secondary Source Information Reviewed. The list is missing the Provincial Policy Statement as well as the Springwater Official Plan. In addition, 'Freele County Forest management documents' are listed however, no specific reference is provided. A copy of these management documents should be provided as it appears that they are being relied upon as part of this report.

Section 3 (Preliminary Development Plan) describes the proposed development and refers the reader to GHD's *Facility Characteristics Report*, provided under separate cover, for additional details. A site concept plan/layout is not included in the EIS for the reader to reference. There is no discussion of grading works that may be required to facilitate the entrance, site preparation, staging areas, etc. and the associated potential negative environmental impacts.

Section 4 (Regulatory/Policy Framework) provides a brief outline of the Springwater and County OP, the Nottawasaga Valley Conservation Authority, Species at Risk Legislation and Provincial Policy Statement. Given that the detailed natural heritage policy implications have been deferred to the EIS, the report should have contained a robust explanation of all the applicable PPS policies, County and Local OP policies, and federal/provincial legislation.

Within **Section 4.5 (Provincially Policy Statement)**, GHD states, "Overall, the proposed ERRC footprint of 4.5ha represents an extremely small disturbance to a greater than 475ha contiguous woodland of the 32,000ha Simcoe County Forest (less than 1% and 0.01% respectively)". It is unclear why this statement is made given that this fact has nothing to do with the on-site evaluation that GHD has been tasked with undertaking. The size of the overall feature is only one aspect that needs to be considered when evaluating significance. Reference to the overall

landholdings of the County (32,000 ha) also suggests that the author is minimizing the potential impacts associated with the proposed development. The overall amount of landholdings by a municipality is not a criterion upon which to determine significant or to measure negative impact.

Also within **Section 4.5**, with respect to significant woodlands, GHD concludes that, based on the size of wooded area, the Study Area contributes to an interior forest habitat that meets the County's minimum size criteria for consideration as a Significant Woodland. Unfortunately, the report then goes on to state that this function (interior forest habitat) is temporary because the property (and ERRC footprint) is part of a managed and actively harvested woodlot. In my opinion, this conclusion is false and it is unclear what fact(s) that author is using to support this conclusion. To remove the interior forest habitat, much of the site would need to be clear cut. Over a period of 69 years (1948 – 2017) such a forestry practice has not taken place on this tract nor does the County Forest Plan suggest that such a practice is contemplated on any County tracts. In fact, through good forestry practices, such as those practiced by the County according to their County Forest Plan, selective harvesting would have no impact on the extent of interior forest habitat. Building on their conclusion, GHD then states that, '*As an actively managed and harvested plantation woodlot, the proposed ERRC footprint and immediately adjacent areas does not exhibit uncommon characteristics or economic and social functional values as defined in the Natural Heritage Reference Manual (MNR, 2010).*' I will defer to Dougan and Associates' analysis of significance however, I would recommend that GHD is building on an erroneous statement with respect to interior forest habitat so the accuracy of the follow-up conclusion must be questioned.

Finally, within **Section 4.5**, GHD concludes that the site does not meet the criteria of Significant Wildlife Habitat. This analysis takes place within one paragraph of the report. I will defer to Dougan and Associates with respect to their opinion as to whether it has been demonstrated that Significant Wildlife Habitat does not exist however, I would have expected the analysis to have been much more robust considering that a minimum of 4.5 ha of wooded area is proposed for removal to facilitate the footprint of the ERRC. Additional impacts associated with the need to widen the existing trail to create a driveway of an appropriate width to accommodate the truck traffic, the relocation of the existing trail and the potential for future expansion also requires additional consideration in the evaluation of no negative impacts.

As stated previously, GHD and the County are relying on a test of **no net effects**. This is further demonstrated through the suggestion in the report that the loss of forest cover can be compensated through the planting of trees elsewhere to offset the loss. Such an approach is not consistent with the PPS requirement to demonstrate **no negative impact**. The proponent must first demonstrate that the proposed development will not have a negative impact on the feature and/or function and only then, if no negative impact is demonstrated, can there be a suggestion of mitigation measures such as off-site tree planting. Even if one was to accept that off-site tree planting could be contemplated as a mitigation measure, the County should be obligated, as part of the EIS and Official Plan Amendment process, to identify where such a location exists that could accommodate 4.5 - 9ha of tree planting (based on a 1:1 or the preferred 2:1 ratio of planting expressed by GHD on page 23). If such a parcel of land is not already in County ownership, presumably the previous evaluation matrix (Parts 1 – 3 of the siting process) should have considered the cost of purchasing such a parcel as well as the cost of tree planting and maintenance. The parcel not only needs to be large enough to accommodate the 4.5 - 9ha worth

of planting, it would also need to be an environmentally appropriate site that is adjacent to existing Greenlands, etc.

I have reviewed the letter prepared by Dougan and Associates dated April 28, 2017. Based on that letter, in their professional opinion, the County has not demonstrated no negative impact on significant woodlands, significant wildlife habitat or the habitat of endangered and threatened species. As such, from a planning perspective, the Scoped EIS has not demonstrated that the proposed development is consistent with the requirements of the *Planning Act*, PPS and County OP. As a result, the Official Plan Amendment should not be approved as it does not meet the requirements of the Province or County.

I have also reviewed the comments provided by the Nottawasaga Valley Conservation Authority (NVCA) dated March 2, 2017. The NVCA raises similar concerns to those raised by Dougan and Associates related to insufficient documentation in the report to support the conclusion that significant wildlife habitat does not exist on the property.

Planning Justification Report, GHD, November 17, 2016

The Planning Justification Report provides an analysis of many of PPS policies including those related to Land Use Compatibility, Infrastructure and Public Service Facilities, Waste Management, Natural Heritage, Water and Agriculture. With respect to Natural Heritage, the report relies on the assumptions and conclusions of the Scoped EIS which, as outlined above, has not, in my opinion, demonstrated consistency with the PPS.

Within **Section 6.1** (County of Simcoe Official Plan – Greenlands Section 3.8), the report concludes that the development of the ERRC will not result in a negative impact as defined in the PPS 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 wooded feature. **Section 10.2** (Scoped EIS & Natural Hazard Land Assessment) again concludes by stating that no net environmental impacts on the larger woodlot feature are anticipated from the development of the proposed ERRC. These conclusions reflect the erroneous inclusion of mitigation measures, and the concept of no net impacts, when determining whether a proposed development will have a negative impact on the natural heritage system, which is inconsistent with the requirements of the PPS.

Summary/Recommendation

Given the requirements of the PPS related to natural heritage and, the resulting OP requirements, it has been my experience that many municipalities make every effort to avoid the placement of infrastructure within the natural heritage system. Many municipalities have policies that only allow for the consideration of *essential* infrastructure (such as roads or utilities) within the natural heritage system and, in such cases, only if the placement of the infrastructure is supported by an Environmental Assessment. In doing so, they model the very behaviour that their OPs are expecting of the general public – that natural heritage systems are to be identified, conserved and protected from the impacts of development.

Based on my review of the Part 1 – 3 siting documents, it is my opinion that the site selection process is not consistent with the *Planning Act* requirements pursuant to the Provincial Policy Statement natural heritage policies as sufficient consideration has not been given to PPS policies 2.1.1 through 2.1.8. In addition, the site-specific documents prepared in support of the Official Plan and Zoning By-Law Amendments are also not consistent with the PPS as it has not been demonstrated that the proposed development will have no negative impact on, at a minimum, significant woodlands and significant wildlife habitat as required by PPS policies 2.1.2, 2.1.5 and 2.1.8. Additional fieldwork by Dougan and Associates may identify other portions of the PPS natural heritage policies that should be addressed in greater detail.

As a result of the above, it is my opinion that the amendments are not consistent with Section 2 of the PPS, County of Simcoe Official Plan policies 3.3.15, 3.8.19 and 3.8.22 or the Springwater Official Plan policies 16.2.1.2(ii)(c), 16.2.1.3(iii), 16.2.1.3(vii), 16.2.1.4.1(c)(ii), 16.2.1.4.2(b)(i)(iii)(vi) and 16.2.1.4.2(c)(i)(e).

I trust the above is of assistance. If you require additional information, please do not hesitate to contact me.

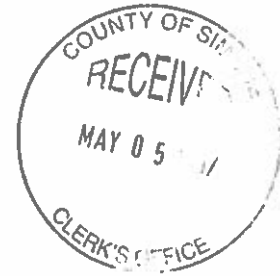
Yours truly,


Jennifer Lawrence, MCIP, RPP
President

Hand Delivered

May 5, 2017

Mr. John Daly, County Clerk
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, ON
L9N 1X6



Re: Part Lot 2, Concession 1
2976 Horseshoe Valley Road West
Township of Springwater
Environmental Resource Recovery Centre
County File: SC-OPA-1602

Dear Mr. Daly,

We are in receipt of the notice of a Statutory Public Meeting for the above noted County Official Plan Amendment.

We would like to make a verbal presentation at the May 9th, 2017 Council meeting. If this is not acceptable, then we wish that this letter to be considered as an official protest to the proposed amendment to the County Official Plan Amendment and any amendment to the Springwater Zoning Bylaw regarding Site C136.

We are opposed to the proposed amendment for the following reasons:

1. An industrial property requires proper infrastructure including emergency response, environmental design to encourage fire suppression, and water supply and discharge that is linked to appropriate sewage treatment. Industrial parks are designed years in advance to locate such facilities as proposed for waste management in Simcoe County. The city of Barrie has ample industrial parks and as such, the facility location under current contract to Simcoe County is located in an industrial park with major highways leading to it so as not to congest or impede traffic.
2. The County's expressed desire to locate the facility, if possible, on lands already owned by the County resulted in the inclusion of County-owned forests in the candidate waste disposal facility sites;
3. Given that the vast majority of County landholdings are County Forests, this resulted in 50% of the candidate sites for a waste disposal facility being within woodlands;
4. If you consider just the County-owned sites that were under consideration, 82% of the sites were woodland areas. This is an overwhelming proportion of candidate sites within areas that most residents of Ontario would consider to be protected from development as outlined in the forestry policies on Simcoe County public website;
5. County Forests should not be considered as a viable option for the construction of infrastructure and should have been excluded from the site selection process based on both natural heritage as well as social and cultural impacts to the broader community; and,
6. The decision-making matrix that was used during the Part 1 – 3 process was not consistent with the requirements of the Provincial Policy Statement. In addition, the Environmental Impact Study has not demonstrated that there will be no negative impact to areas of provincial interest, such as woodlands, wetlands and wildlife habitat, as required by the *Planning Act*.

7. The statement Simcoe County uses "For the Greater Good" has become one with an excuse to marginalize the small group of residents and farmers where this site is proposed.
8. The inconsistent statements of Simcoe County to not use Rainbow Valley Road East as access or egress from the forest during development of this site, yet all winter and fall 2016/2017 the county has used the Rainbow Valley Road East road to access the site. Parking vehicles on the driven portion of the roadway in an unsafe manner and putting extra stress on the road surface which is gravel and now full of pot holes despite efforts of the Township of Springwater to keep it in good driving condition, the back roads simply cannot support extra traffic – especially Rainbow Valley Road East which is a dead end.
9. The fact that the existing plan was in effect when we searched to build our home and farm business – it was suitable and in fact more desirable believing that Simcoe County Forests were under a solid agricultural plan and waste management or building on agricultural land was not a possibility for the future.
10. That any light at night time from the facility which is in very close proximity to our farm will interfere with the natural breeding cycles of mares – our agricultural income. Also the noise of dump trucks, construction equipment and constant deafening noise from ventilation systems and crushers will be heard constantly in an area that is now silent except for nature sounds. This constant noise will disrupt again the development of livestock, specifically horses who are naturally highly susceptible to startle and do not let their guard down until they feel safe. This constant state of heightened stimulus and hyper vigilance will impede the development of foals and the conception rates and growth rates of mares. The mares in question are very expensive since many are imported from Europe. Their offspring contribute to the Canadian presence at the Olympic in Equestrian sport categories.
11. The fact that the plan suggests only a small portion of the forest will be used, but the entire forest atmosphere and usage for anything else is completely disabled.
12. Aware Simcoe published a letter supporting a site that was not forest property, was set in an already industrialized area near Napoleon production plant, near major arteries of highway, to be showcased by Simcoe County and developed community partnerships with nearby Georgian College was stellar. It is alarming that the County wants to hide an industrial facility in a forest so they are less under the watchful eyes of the public is alarming. Even the engineers agreed the weighting of a buffer could go either way either positive or negative. Place a properly designed, magnificent piece of engineering in a well-designed already existing industrial zone people avoid residing as they expect such an edifice to be erected. Do not place a hastily pushed project in a forest, just because it is already owned by the project supporters, in the middle of a forest where no one can hear the nearby residents scream in protest. Industrial parks are designed years in advance with proper infrastructure and notice for people to avoid settlement because industrial parks and proper urban and rural design is FOR THE GREATER GOOD.

Based on the above, we would ask that the County not approve the Official Plan Amendment. we would like to be notified of the adoption or refusal of the proposed Official Plan Amendment.

Yours truly,

Edward Krajcic *SKrajcic*

Name: Mr. & Mrs. Edward Krajcic

Address: 1286 Rainbow Valley Road East

Phelpston, ON L0L 2K0

Mr. John Daly, County Clerk
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, ON
L9N 1X6

Concerning: Part Lot 2, Concession 1
2976 Horseshoe Valley Road West
Township of Springwater, Environmental Resource Recovery Centre
County File: SC-OPA-1602

May 8th, 2017

Dear Mr. Daly,

We are in receipt of the notice of a Statutory Public Meeting for the above noted County Official Plan Amendment. We oppose to the proposed amendment for the following reasons:

1. We are very concerned about the use of our County owned forests for non-forest uses. The siting process started with approximately 500 sites and almost half of these sites were County owned forests. Why is our County including our forests as usable land for industrial/waste purposes? There were industrial sites considered that would be much more appropriate. What is in store for the future of our forests if this project is successfully placed in the Freele forest without the support of the citizens across this County?
2. We use this forest land for recreational purposes almost daily. The county forests are why we moved into the area. which is a critical draw for living in this area. We have to be very concerned about the loss of greenspace, traffic increase and the air pollution impact of this decision. Industrial sites are zoned as industrial for this purpose. Why bother with zoning if you do not taking the zoning seriously? We are outraged that this plan is set to take waste products from other communities than what is directly our own. Politicians need to be in touch with the citizen's preferences.
3. The decision-making process that was used during the Part 1 – 3 was not consistent with the requirements of the Provincial Policy Statement.
4. The Environmental Impact Study has not proven that there will be no negative impact to areas of provincial interest, such as woodlands, wetlands and wildlife habitat, as required by the *Planning Act*.

Based on the above concerns we are asking the County not to approve the Official Plan Amendment. We would like to be notified of the outcome of the proposed Official Plan Amendment.

Ruth McKay & Jim Purnell
34 Trillium Trail
Coldwater, Ontario
L0K 1E0

Date: May 7, 2017

Mr. John Daly, County Clerk
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, ON
L9N 1X6

Dear Mr. Daly,

Re: Part Lot 2, Concession 1
2976 Horseshoe Valley Road West
Township of Springwater
Environmental Resource Recovery Centre
County File: SC-OPA-1602

I am in receipt of the notice of a Statutory Public Meeting for the above noted County Official Plan Amendment.

I am opposed to the proposed amendment for the reasons set out below and I would ask that the County not approve the Official Plan Amendment. I would like to be notified of the adoption or refusal of the proposed Official Plan Amendment..

Attached to this letter is a copy of submissions made to County staff following an information meeting in Hillsdale which I incorporate by reference in to this letter. I also append a copy of the responses from the County staff to the points raised. I request that these submissions and the responses from County staff be made part of the public record for this meeting.

I should state at the outset that I participate in and support endeavours to handle waste responsibly by reducing, reusing and recycling, but do not believe this should be accomplished at the expense of equally valuable parts of the environment, particularly where viable alternatives exist.

In my previous submission, I raised two fundamental issues, namely the use of County Forest for an industrial operation and the lack of a sound business case for the proposal. Those concerns still exist.

1. Business case

With respect to the business case, I would like to draw Council's attention to a recent posting in the Globe and Mail, Friday May 5th. page B6, in which BDO requests offers for an organic waste processing facility in Belleville that is now in Receivership. This is the Astoria facility in Belleville which was built in 2015 for \$19, 000,000. It now appears not to be financially viable.

2. Use of Forest tracts for industrial activity.

I, like most people I believe, consider the County Forest to be exactly that, a forest owned by the County on behalf of the residents of Simcoe County, that is available to residents for recreation and to improve the environment in which we live. The County's own web site reinforces this perception by stating:-

“these forests provide a multitude of environmental, social, and economic benefits to the County including protection of wildlife habitat and water resources, public education, recreation, scientific research and the production of wood products.”

The County lauds its activity in this regard, emphasizing its long term planning, careful management and its membership of the Forestry Stewardship Council. At no point does it promote the holding of these lands for eventual industrial sites or for whatever use the County deems appropriate.

I moved to Springwater relatively recently and one of the factors influencing the decision was the existence of a large tract of forest at the end of the street on which we intended to live. The signage on the forest trails promoted recreational use, maps showed an extensive trail network, and there was a reasonable certainty that these lands would remain as forest for well beyond the foreseeable future. Anyone conducting due diligence would find nothing to suggest otherwise.

It now appears that this confidence is misplaced. Recent activity at Orr Lake, the inclusion of 5 County Forest sites in a short list of 6 sites, and the continuing attempts to convert this site from agricultural to industrial zoning suggests that the County Forest is simply considered a land holding.

My concerns in this regard are based on the record of the Council to date and past experience in Oakville, where I lived for 32 years before moving to Springwater. In preparing to move, I found a map of Oakville dated 1980. It showed a broad swath of land designated green belt and occupied by farms, and similar rural activity. The first incursion in to that green belt was a new office building for the Regional government, followed by a vehicle maintenance facility and further office buildings. This of course opened the floodgates for further development, including ironically a waste transfer station and organic materials facility for the entire region. The Region led the destruction of the green belt rather than protect it in a manner consistent with good planning practices.

It appears, at face value, the same is happening in Simcoe. In order for Council to enjoy the confidence and support of the people it represents, it must act in a predictable and consistent manner. The County's own website in outlining the history of the Simcoe County Forest rather dramatically berates previous generations in their treatment of the forest.

“For a hundred years the forests of Simcoe County fell to the lumberjack's axe with no thought of conservation for tomorrow.”

Will this Council be described in similar terms by future generations?

I would ask that Council should reflect on whether the proposal to utilize County Forest for industrial purposes is

- i) consistent with its public statements and policies,
- ii) will undermine the confidence of the residents of Simcoe in its Council;
- iii) is fair and reasonable to those residents who have relied on the status of the County Forest promoted by the County in the past; and
- iv) is the only viable option that exists to accommodate such a facility.

3. A missed opportunity

The desire of the County to establish an Environmental Resource Recovery Centre presents an opportunity for a Council with vision and leadership to address major concerns of its residents, without the adverse impact of the County Forest.

I recently attended a visioning exercise held by Springwater Township as part of its strategic planning process. In "my" group two issues emerged as paramount, namely the preservation of the agricultural nature of the Township and the creation of job and career opportunities to maintain the viability of the communities in the Township.

The present proposal for the ERRC does neither of these. In fact it destroys agricultural land and will at best divert jobs from existing facilities. The controversial nature of its location has emphasized minimizing its footprint, thereby rendering it self-limiting in expanding its scope and range of activities.

By selecting an appropriately serviced industrial site, Council could use the ERRC as an anchor tenant for an Environmental Technology Industrial Park that would utilise existing resources in the County, provide an incubator to support new technologies and attract established business in the environmental field. Such an initiative would preserve the existing agricultural land and provide job and career opportunities in the local economy.

The basic building blocks already exist within Simcoe.

I act as a mentor at the Henry Bernick Entrepreneurial Centre at Georgian College and in that role have seen a number of emerging technologies that would directly benefit from an incubator of this type. Some of these require feedstock of the nature that would be provided by the ERRC, others would benefit from the byproduct of the organic waste processing, notably heat, and others need real world conditions to validate their concepts.

Georgian College, which is presently building an incubator for Advanced Technology, has a Centre for Sustainable Technology, which would be a natural partner of an incubator in an Environmental Park.

Barrie has recently established a Department of Creative Economy to nurture new technologies, which of course include developments in the environmental technologies.

A significant number of established firms exist in Simcoe who would benefit from a state of the art facility to expand their businesses.

The benefit to the County is of course employment, increased industrial base, increased tax base and a leadership position in emerging technology.

As part of the consideration of the present proposal I would therefore ask Council to direct staff to report on the viability of an Industrial Park of this nature as an alternative to the dedicated ERRC facility under consideration.

4. Summary

I would ask Council to reject the proposed amendment on the basis that it is an inappropriate use of County Forest, is inconsistent with public positions taken by Council, establishes a precedent for the further industrialization of the County Forest, and to direct staff to consider other viable options that do not utilize the County Forest.

Yours truly,

Name: John Orange

Address: _9 Pinehurst Lane, Minesing, Ont. L9X 0C7.

Submission following public information meeting.

1. Site evaluation.

It surprised me that all of the short listed sites lie in a relatively small area centred in Springwater Township. I understand from the consultant's representative that this is a result of computing the centroid of population to minimize the distance travelled from collection to the MMF site. However, the computation only appears to take in to account "inputs" to the MMF. It is my understanding from comments at the meeting that all of the non-organic materials are subsequently transferred from the MMF to processing facilities generally in the GTA. A round trip of 165 km was quoted. Computing the centroid with both input and output journeys included would shift it significantly south, even if the number of journeys made for the output is less because of the size of vehicle used.

I also understand that the centroid was determined using the population of Barrie and Orillia. However, according to FAQ's provided at the meeting, these are "separated cities" and have their own facilities. As such, the population of those cities should have been excluded from the computation of the centroid.

The site selection criteria excluded traffic impact as a factor in screen 1 or 2. However, if the representations regarding odour and noise are taken at face value, the major impact on neighbours to potential sites is likely to be traffic. Even the busiest road will see a 5% increase in traffic, less busy roads will see a correspondingly larger increase. This is a major issue and should be one of the fundamental factors in selecting potential sites.

The corollary of course is that if the siting criteria for this facility are appropriate, it follows that ALL other County projects, such as health care facilities, arts centres, libraries an the like should also be located in Springwater as they will then also be equally available to all residents!

2. The business case

Whilst I understand the concerns about availability of third party sites in the future, the need to build a self contained Simcoe facility reeks of Empire building. Other opportunities exist, such as partnering with other regions or the "separated cities" or as a PPP with long term, contractually guaranteed access. These do not seem to have been explored.

The savings are projected at \$13million over 20 years, or \$650,000/year. The construction cost of the OPF alone is between \$10 and \$35 million. No cost is provided for the MMF, nor any estimate of the infrastructure costs such as road upgrades that may have a significant impact on the overall cost.

According to FAQ's secured funding of \$1.15million is in place, but this is only 3% of the projected cost for the OPF. It is also contingent on the facility being able to process the materials received. It is unclear whether this contemplates expansion of the MMF to include recycling processes or whether it refers to the organics only.

Whilst a business case is to be presented, by excluding other options, the justification is inevitable.

3. Use of Simcoe Forest lands

Many of the sites propose to use existing tracts of Simcoe County forest. It appears the Council view these lands as a "land bank" to be developed at whim for projects totally unrelated to forest preservation. Most residents, I believe, view these lands as an asset that contributes to lifestyle available in Simcoe. To hear that it is simply held until some other use can be found for it is disturbing. It is only necessary to

consider the zoning for the MMF, namely industrial, to see how inappropriate it is to consider the use of forest tracts for this purpose.

Response received from County Staff, 7 Dec 2015.

Mr. Orange,

Thank you for your feedback in regard to the two infrastructure projects. I believe we had the opportunity to speak at the Hillsdale consultation session and we appreciate this follow-up correspondence. Please see below our response to your comments (in blue) on the site evaluation criteria, the business case, and the use of County forest sites. Note that all reports referenced in our response can be found at www.simcoe.ca/opf and www.simcoe.ca/mmf.

1. Site evaluation.

It surprised me that all of the short listed sites lie in a relatively small area centred in Springwater Township. I understand from the consultant's representative that this is a result of computing the centroid of population to minimize the distance travelled from collection to the MMF site. However, the computation only appears to take in to account "inputs" to the MMF. It is my understanding from comments at the meeting that all of the non-organic materials are subsequently transferred from the MMF to processing facilities generally in the GTA. A round trip of 165 km was quoted. Computing the centroid with both input and output journeys included would shift it significantly south, even if the number of journeys made for the output is less because of the size of vehicle used.

The center of waste generation was calculated by the County's Geographical Information Systems (GIS) Department using the specific location of households where we currently collect waste. This was a weighted centroid in that it took into account multi-residential units such as condominiums and apartments. For your information, this is further outlined in the consultant's first siting report for the Materials Management Facility (*County of Simcoe Materials Management Facility – Part 1 – Planning – Siting Methodology and Evaluation Criteria*, Conestoga-Rovers & Associates (CRA)) in Section 4.2.1 on page 22.

As you noted, consideration of curbside collection – inbound collection vehicles – was used to determine this point. It did not consider output or, in addition, input from County drop-off facilities. This was in consideration of the following:

- at the 30-year design capacity, ~60% of the vehicles coming to the MMF will be from curbside collection;
- the efficient operation of the MMF will largely be dependent on managing the inbound curbside collection vehicles which must collect waste throughout the County but be able to return to the centralized transfer point and discharge in a timely manner;
- only 20% of the vehicles will be larger, outbound transfer trailers destined for final markets. There is no certainty as to the location of final disposal/processing locations. These trailers may, with new contracts, travel northbound or use routes north of the County to access markets to the east; and
- 10% of the vehicles will be inbound from eight County drop-off facilities. These facilities are located in Collingwood, Clearview, Midland, Oro-Medonte, Severn, Ramara – more northern locations – and Adjala-Tosorontio and Bradford in the south. The busiest site is the North Simcoe Transfer Station in Midland.

I also understand that the centroid was determined using the population of Barrie and Orillia. However, according to FAQ's provided at the meeting, these are "separated cities" and have their own facilities. As such, the population of those cities should have been excluded from the computation of the centroid.

From staff report Item CCW 15-078 – Materials Management Facility – Siting Methodology and Evaluation Criteria (February 26, 2015):

It should be noted that the "waste centroid" calculations include data from the separated cities of Barrie and Orillia in consideration of the CIF funding previously discussed. Again, this funding is contingent on the County's transfer facility considering the potential for other neighbouring municipalities to utilize this facility on a cost recovery basis.

Barrie and Orillia have both committed to considering the MMF in their next procurement opportunities for blue box recycling as they currently utilize contracted services for transfer and processing of this material.

The site selection criteria excluded traffic impact as a factor in screen 1 or 2. However, if the representations regarding odour and noise are taken at face value, the major impact on neighbours to potential sites is likely to be traffic. Even the busiest road will see a 5% increase in traffic, less busy roads will see a correspondingly larger increase. This is a major issue and should be one of the fundamental factors in selecting potential sites.

The corollary of course is that if the siting criteria for this facility are appropriate, it follows that ALL other County projects, such as health care facilities, arts centres, libraries and the like should also be located in Springwater as they will then also be equally available to all residents!

Your comments will be forwarded to our consultant as part of their final evaluation of the sites.

2. The business case

Whilst I understand the concerns about availability of third party sites in the future, the need to build a self contained Simcoe facility reeks of Empire building. Other opportunities exist, such as partnering with other regions or the "separated cities" or as a PPP with long term, contractually guaranteed access. These do not seem to have been explored.

The savings are projected at \$13million over 20 years, or \$650,000/year. The construction cost of the OPF alone is between \$10 and \$35 million. No cost is provided for the MMF, nor any estimate of the infrastructure costs such as road upgrades that may have a significant impact on the overall cost.

Note that the cost of the Organics Processing Facility (OPF) will be dependent on the technology selected. The above-referenced savings would be for the Materials Management Facility (MMF). For reference, information on costs of the facilities has been provided to County Council in the following staff reports:

Item CCW 14-025 – Central Composting Update (January 28, 2014) – page 4

Item CCW 14-253 – Transfer Facility Assessment (August 12, 2014)

According to FAQ's secured funding of \$1.15million is in place, but this is only 3% of the projected cost for the OPF. It is also contingent on the facility being able to process the materials received. It is unclear whether this contemplates expansion of the MMF to include recycling processes or whether it refers to the organics only.

Whilst a business case is to be presented, by excluding other options, the justification is inevitable.

Secured funding has been established for the MMF as use for transfer. It is contingent, however, that expansion to process blue box recycling be a potential option in the future. Siting of the facility will therefore consider this. For reference, this was outlined for County Council in the following staff report:

Item CCW 14-344 – Transfer Facility Funding Update (August 26, 2014)

3. Use of Simcoe Forest lands

Many of the sites propose to use existing tracts of Simcoe County forest. It appears the Council view these lands as a "land bank" to be developed at whim for projects totally unrelated to forest preservation. Most residents, I believe, view these lands as an asset that contributes to lifestyle available in Simcoe. To hear that it is simply held until some other use can be found for it is disturbing. It is only necessary to consider the zoning for the MMF, namely industrial, to see how inappropriate it is to consider the use of forest tracts for this purpose.

Again, we appreciate your comments on the projects and the short-list of sites. Public and stakeholder feedback on the potential sites will be an important component of the decision-making process. Your response will form part of the project record and will be forwarded to our consultant for consideration as the sites are further evaluated. Comments received by the County during the consultation process, the results of the evaluation, and details on the preferred site will form the third siting reports, anticipated to be presented to County Council in early 2016 for their direction.

My contact information is below should you have further questions or wish to discuss the above further. Alternatively, we can make arrangements to meet and discuss the projects in person at your convenience.

Regards,

Stephanie Mack, P.Eng.

Special Projects Supervisor

County of Simcoe, Solid Waste Management

1110 Highway 26, Midhurst, ON L0L 1X0

Phone: (705) 726-9300 ext. 1924, Cell: (705) 794-0605

E-mail: stephanie.mack@simcoe.ca

simcoe.ca

May 12, 2017

Mr. John Daly, County Clerk
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, ON
L9N 1X6

Dear Mr. Daly,

RE: Part Lot 2, Concession 1
2976 Horseshoe Valley Road West
Township of Springwater
Environmental Resource Recovery Centre
County File: SC-OPA-1602

I attended the Statutory Public Meeting for the above noted County Official Plan Amendment before County Council on May 9th, 2017. At that time we were encouraged to provide written comments on the proposed project and wish to make it public record of concerns that myself and others in our community have.

To start, these facilities are infamous for fires. During the near neighbours tour which was facilitated by the Council, questions were asked at all of the stops about fire and it was confirmed that fires are a regular occurrence in these facilities. All these visited facilities are located on Industrial Land, not in a forest.

This should not be a surprise to anyone familiar with Springwater Township and Material Handling Facilities. On May 13, 2014 a smaller facility than proposed for Freele Forest, in the Bertram Industrial Park burnt to the ground and took 16 hours to extinguish it. It required more than 150,000 gallons of water, 19 apparatuses and 75 fire fighters from neighbouring communities to extinguish. The damage for property and contents exceeded 1.5 million dollars. This was in an Industrial site, where precautions are made to ensure separations from buildings, hard topped with easy access onto the site.

My past experience with building and development for the type of facility that you are proposing and the life safety measures that would be required, make me seriously question your logic. When asked at an open house about the risk of placing it in a forest, your consultant indicated that it was not problem, that the buildings would be sprinklered. May I note that the building fire in Bertram Industrial Park mentioned above was also sprinklered. The difference was that there was not fire load on site that could have spread the fire to neighbouring properties and households in the form of trees, forest floors, shrubs, etc. Fires in Canada last year seriously showed the ability of a spark in a forest to spread destruction and financial loss to all surrounding it.

Taking the worse case scenario, if a fire were to occur, please note that this facility location is surrounded by "dead end" roads. To the north is Rainbow Valley Road, Base Line Road and Flos Road 3 East. These roads are all under 1 mile of the Freele Tract and most certainly make evacuation of the roads north and east of the property almost impossible if a fire were to occur placing homeowners and

livestock at risk. There does not appear to be any evacuation routes discussed in your plans, nor are there any upgrades to roads for access to the neighbouring properties who would be at risk. Since the entire properties to the north and easterly direction are heavily wooded, it would be suggested that upgrading the roads to provide an evacuation route be implemented.

It is with disbelief that the County is considering placing a potentially dangerous facility in an area that is not suited to this type of industrial use. Please consider the appropriate location, one of an industrial zoning, not a forest with the potential to destroying not only the forest, but the safety of the homeowners of Simcoe County.

The County is placing its taxpayers at risk by proposing this use in a forested area. I would ask that the County not approve the Official Plan Amendment.

I request that I be notified of the adoption or refusal of the proposed Official Plan Amendment.

Yours truly

Heather J. Rutherford, C.B.C.O., C.E.T.
1484 Flos Road 3 East
Phelpston, ON
L0L 2K0

Hand-Delivered

May 1, 2017

Mr. John Daly, County Clerk
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, On L9N 1X6



Dear Sir:

Re: Part Lot 2, Concession 1
2976 Horseshoe Valley Road West
Township Of Springwater
Environmental Resource Recovery Centre
County File: SC-OPA-1602

I am in receipt of the notice of a Statutory Public Meeting for the above noted County Official Plan Amendment. I wish to appoint ^{in place of} Mrs. Ed Krajcir as my surrogate to make a verbal representation at the May 9th, 2017 Council meeting. If this is not acceptable, then I wish my letter to be considered as an official protest to the proposed amendment to the County Official Plan Amendment and any amendment to the Springwater Zoning Bylaw regarding Site C136.

My reasons are as follows:

1. There are no sewer services to the site. This will entail the construction of a holding pond for the leachate. This leachate is contaminated water. At times of excessive rainfall (which are frequent in this area) the water will overflow into the wetlands immediately below the site. This is in very close proximity to Matheson Creek which flows through the Minsesing Wetlands. These ponds require frequent and expensive maintenance. Contamination to Springwater's water is inevitable. This water is presently the golden standard for scientists world-wide.
2. There will be noise and light contamination caused by heavy trucks accessing and egressing the site every few minutes during the day and security lights being used during the night time.
3. Dust, odour, oil and grease will be prevalent due to the nature of the operation and the garage which will eventually be built on-site should this facility be approved.
4. Substantially increasing traffic on an already dangerous highway due to blind, steep hills; which is already heavily trafficked due to subdivisions, a village, a gravel pit and tourists is ill conceived at best. These trucks may already be on the roads but they are not all presently congregating halfway down a hill on Horseshoe Valley Road.
5. The dangers due to fire hazards are extreme. Each operation of this nature has had numerous fires including one in Springwater that burnt the facility completely. There are many homes and businesses located very close to this proposed site. It is heavily forested and a fire would be catastrophic. There would also be a considerable cost to the residents of Springwater due to the necessity of upgrading their fire fighting capacity.
6. There is a wildlife corridor running through this site. A herd of deer is frequently seen here as well as other forms of wildlife. The noise and vehicular traffic along with the fencing would certainly be very disruptive to the environment.
7. The conditions imposed on the consulting firm that chose the sites (that is the site be located on County-owned land if at all possible) resulted in the inclusion of County-owned forests as 50%

of said lands is woodland.

8. 82% of the sites recommended were woodland. The majority of residents (all those to whom I have spoken) consider County forests to be protected from development.
9. County forests should not be considered as a viable option for the construction of industrial facilities and should have been excluded from the selection process. There were and are industrial sites available within Simcoe County that are far more suitable for this purpose.
10. The **extreme** proximity to established businesses and homes should have excluded this site.
11. The decision making matrix used during the Part 1-3 process was not consistent with the requirements of the Provincial Policy Statement. In addition, the Environmental Impact Study has not demonstrated that there will be no negative impact to areas of provincial interest, such as wetlands and wildlife habitat as required by the Planning Act.
12. There has not been, to date, a true cost analysis done on this project. The type of process has not been decided. We, the public, are being asked to buy a "pig in a poke".

Based on the above. I would ask the the County not approve the County Official Plan Amendment and further, that the Township of Springwater deny any requested change to the Zoning Bylaw re site C136 (which would be required for this project to proceed). I wish to be notified of the adoption or refusal of the proposed County Official Plan Amendment.

Respectfully submitted,



Karen L. Smith
29 Lawrence Avenue
Minesing, Ontario
L9X0W4

May 1, 2017

Mr. John Daly, County Clerk
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, ON
L9N 1X6



Dear Mr. Daly,

**Re: Part Lot 2, Concession 1
2976 Horseshoe Valley Road West
Township of Springwater
Environmental Resource Recovery Centre
County File: SC-OPA-1602**

I am in receipt of the notice of a Statutory Public Meeting for the above noted County Official Plan Amendment.

I am opposed to the proposed amendment for the following reasons:

1. The County's expressed desire to locate the facility, if possible, on lands already owned by the County resulted in the inclusion of County-owned forests in the candidate waste disposal facility sites;
2. Given that the vast majority of County landholdings are County Forests, this resulted in 50% of the candidate sites for a waste disposal facility being within woodlands;
3. If you consider just the County-owned sites that were under consideration, 82% of the sites were woodland areas. This is an overwhelming proportion of candidate sites within areas that most residents of the County would consider to be protected from development;
4. County Forests should not be considered as a viable option for the construction of infrastructure and should have been excluded from the site selection process based on both natural heritage as well as social and cultural impacts to the broader community; and,
5. The decision-making matrix that was used during the Part 1 – 3 process was not consistent with the requirements of the Provincial Policy Statement. In addition, the Environmental Impact Study has not demonstrated that there will be no negative impact to areas of provincial interest, such as woodlands, wetlands and wildlife habitat, as required by the *Planning Act*.
6. The County forest is designated "Greenland" in the County Official Plan and should be protected. There is no justification for putting an "Industrial Use" on lands designated Greenland when there are industrial sites available.

Based on the above, I would ask that the County not approve the Official Plan Amendment.

I would like to be notified of the adoption or refusal of the proposed Official Plan Amendment.

Yours truly,

A handwritten signature in black ink that reads "Nick Van Casteren". The signature is written in a cursive style with a large, stylized initial "N".

Nick Van Casteren
3066 Horseshoe Valley Road West and
3088 Horseshoe Valley Road West
Phelpston, On L0L 2K0

May 18, 2017

Mr. John Daly, County Clerk
County of Simcoe Administration Centre
1110 Highway 26
Midhurst, ON
L9N 1X6

Dear Mr. Daly,

This letter is in reference to the ERRC project that the County of Simcoe is planning for the Freele Tract at 2976 Horseshoe Valley Road in Springwater Township.

We are a homeowner whose home is located adjacent and east of Site C-136, otherwise known as the Freele Tract.

As the County continues with its plans we must prepare for the safety of our home which is not just a physical house. It was built by ourselves in 2001 on family land we purchased. I used due diligence and spoke with the township and county staff to determine what plans were in consideration for this area. Looking at the County of Simcoe Forest Management Plan and track record for acquiring forest for what I believed was going to be recreation and conservation, my husband and I paid significant cost to build our home deep in the interior of the 50 acres of forest on our property. Our property lines and home are contiguous with the Friele Forest. The Dunlop 100 acre forest forms our northern property line. We have one road into our house approximately 500 m long through forest.

In case of emergency, this is the only way for our families to reach our homes and it's the only way for our family to leave the area from our home. Should this road become impassable due to fire our family, horses, dogs and cats will become trapped in this dense forested area.

During a tour of the Guelph facility for near neighbours arranged through County staff, it was confirmed that fires are a common occurrence. In 2014, a facility smaller than the ERRC proposed for the Freele forest, located in Springwater Township, burned to the ground after a 16-hour battle that required the assistance of 75 fire fighters from neighbouring communities. This facility had safety precautions in place, including anti-fire devices, and as we understand, so will the ERRC. You should also note that not only was this facility located on an industrial site which was better suited to contain and control emergency situations such as this fire, but so too did it offer easier access to the facility when emergencies arose.

To date, we have been unable to locate any type of **Emergency Response Plan** that addresses evacuation routes for residents. Nor have we been able to locate anywhere in the County's plans any intentions to upgrade roads for better access to the neighbouring properties at risk.

Should a worst-case scenario occur with no proper emergency evacuation routes in place, the fate of our family, livestock and home will be needlessly placed at *great* risk.

We implore County Council to reconsider this project for a site that is properly suited and set up for industrial use. We ask that Council NOT approve this Official Plan Amendment.

Should you have any questions for our families concerning the above, please do not hesitate to contact us.

Sincerely,

Mary and Robert Wagner

Cc: council@springwater.ca
bill.french@springwater.ca
don.allen@springwater.ca

April 24, 2017

The County Clerk
County of Simcoe Administration Centre
1110 Highway 26
MIDHURST, Ontario
L9N 1X6



Attention: John Daly

Dear Sir:

**Re: Part Lot 2, Concession 1
2976 Horseshoe Valley Road West
Township of Springwater
Proposed Site for County of Simcoe Garbage Depot
County File: SC-OPA-1602**

I am in receipt of the notice of a Statutory Public Meeting for the above noted County Official Plan Amendment. I intend to make verbal representation at the May 9, 2017 Council meeting.

I am opposed to the proposed amendment for the following reasons:

1. The County Council's expressed desire to locate the proposed depot on lands held in Trust by the County for the residents of Simcoe County, has resulted in the inclusion of all forests which are held in Trust for the residents of Simcoe County as candidates for the proposed garbage depot;
2. Given that the vast majority of County landholdings which are held in Trust for the residents of Simcoe County are, in fact, County forests, this has resulted in 50% of the candidate sites for a garbage depot being within our woodlands;
3. Considering only the sites that are held by the County of Simcoe in Trust for the residents of the County, 82% of the sites that were put forward are woodlands. This is an overwhelming proportion of candidate sites within areas that most residents of the County would consider to be protected from development;
4. Forests that are held by the County of Simcoe in Trust for the residents (including future generations) of the County should not be considered as acceptable options for the construction of infrastructure, and should have been excluded from the site selection process based on both natural heritage as well as social and cultural impacts to the broader community; and,

5. The decision-making matrix that was used during the Part 1 – 3 process was not consistent with the requirements of the Provincial Policy Statement. In addition, the Environmental Impact Study has not demonstrated that there will be no negative impact to areas of provincial interest, such as woodlands, wetlands and wildlife habitat, as required by the *Planning Act*.
6. There are numerous industrially-zoned sites available within the County which will result in equal (or greater) savings in garbage transportation costs, which is supposedly a main consideration for construction of the proposed depot. Indeed, one such industrial site has already been suggested by two of the County Councilors (i.e. the Mayor and Deputy Mayor of Springwater Township, the proposed host community).

Based on the above, I would ask that the Councilors of the County of Simcoe not approve the proposed Official Plan Amendment.

Please ensure that I am notified of the adoption or refusal of the proposed Official Plan Amendment.

Yours truly,



R.W. Wagner (Mr.)
2928 Horseshoe Valley Road West
Phelpston, Ontario
L0L 2K0