Dear Hon. Piccini,

The Made in Ontario Environment Plan commits the province to: “Build on previous successes and continue to implement the Lake Simcoe Protection Plan to protect and restore important natural areas and features of the lake.”

There are two simple ways the province can action this promise:

1. Pay the balance to build the Holland Marsh Phosphorus Reclamation Centre.

2. Increase Natural Heritage protections through the implementation of the Growth Plan Natural Heritage System via the Municipal Comprehensive Review underway.

Pay the balance to build the Holland Marsh Phosphorus Reclamation Centre.

Sixteen million dollars in Federal money is on the table, and if Ontario does not pay the balance and get the Reclamation Centre off the ground, no phosphorus reduction will have been made other than those offsets required under the Lake Simcoe Protection Plan (LSPP). Phosphorus (P) loads have gone up since 2008 and the P loads from the massive amounts of new development being pushed through the Municipal Comprehensive Review will worsen the situation, even with the LSPP’s development, stormwater management, and P load offset policies in place.

We believe the province has a responsibility to keep its promises. Paying York Region’s share of the Holland Marsh Phosphorus Reclamation Centre would be a step in the right direction. The reclamation centre is anticipated to remove a minimum of 2.5 tonnes / year of the current P loads to Lake Simcoe. For context, the Lake Simcoe Protection Plan P load target is 44 tonnes / year. The current ten year average load is roughly 90 tonnes / year. The province must make progress towards achieving the LSPP P load target.
Increase Natural Heritage protections through the implementation of the Growth Plan Natural Heritage System via the Municipal Comprehensive Review underway.

This can be done in the following ways:

Direct upper tier municipalities in the Lake Simcoe watershed to:

a. Use the province’s 2011 map of High Quality Natural Cover\(^1\) in the Lake Simcoe watershed in their NHS mapping;

b. Limit removals to the province’s NHS map in areas of High Quality Natural Cover, to approved plans of subdivision that conform the the Growth Plan, and were in approved settlement area boundaries as of July 1, 2017;

c. Not remove small patches of natural heritage within mapped areas of High Quality Natural Cover.

**Background and policy rationale for NHS implementation:**

The province requires municipalities to implement the Growth Plan Natural Heritage System (NHS) map via the Municipal Comprehensive Review slated to be complete by Autumn 2022.\(^2\) Putting more natural features in the province’s Growth Plan Natural Heritage System will give some green spaces MORE policy protection than they now receive, and would be consistent with Ontario's promise to protect and restore important natural areas and features of the lake [Simcoe]. But through their mapping refinement exercise, Simcoe County has recommended more areas be removed from the province’s Natural Heritage System map than we think the province’s criteria and laws recommend. For example:

- There is a challenge acknowledged, and identified in the province’s NHS technical guidance, around the protection of NH in a highly fragmented landscape. That defines the Lake Simcoe watershed and Innisfil in particular. This guidance recommends the protection of smaller patches in fragmented landscapes. North South Environmental (consultants), Simcoe County and the Ministries of Environment, Conservation and Parks, and Natural Resources and Forestry must ensure that no small patches of natural cover that are close to, or are within, areas of High Quality Natural Cover (HQNC) are removed from the NHS.

- Simcoe County is recommending removing 7000 sites from the NHS where there are “minor discrepancies” in mapping of areas less than 1 hectare. The rationale is ease of administration. This is not an adequate approach given the gravity of the situation. The province’s Lake Simcoe High Quality Natural Cover map provides the science and logic behind our request.

---

\(^1\) This provincial map has been available on LIO since 2011. In 2011 there was 28% High Quality Natural Cover in the Lake Simcoe watershed, and only half of that was well protected by provincial policy. The LSPP’s target is 40% High Quality Natural Cover. There is no provincial plan to achieve this target.

for keeping more of these small areas in the NHS mapping. Every undeveloped little bit of Natural Heritage in the mapped areas of HQNC must be protected.  

- Simcoe County has taken out registered plans of subdivision from the NHS map. But some of those won’t get developed for 30 plus years, if ever. We think those should remain as the province mapped them, IN the Natural Heritage System. Registered plans of subdivision that are not going to be developed with the 2021/2022 Municipal Comprehensive Review (Official Plan) updates to 2051 should remain in the provincial NHS. As per the Growth Plan policies, if they are not contiguous with existing settlement area boundaries there is no justification at this time for their removal from the NHS as they should not be approved for development. See Growth Plan policy 5.2.8.4 and Growth Plan policy 4.2.2. Simcoe County must follow the criteria for removal in the Growth Plan NHS technical guidance. 

- Yesterday Simcoe County Council met for a Q&A about the MCR. When asked about this decision to remove all registered plans of subdivision from the province’s NHS map, staff asserted that they are doing so because these plans have “have been through a planning process.” This is a gross simplification, a misunderstanding of what is in their mapping, or a deliberate deception.

---

3 North South Environmental. 2021. Review and Refinements to the Natural Heritage System for the Growth Plan Report (p. 21)  

4 A Place to Grow Act 2020 “Other implementation” policy 5.2.8.4: If a plan of subdivision or part thereof has been registered for eight years or more and does not meet the growth management objectives of this Plan, municipalities are encouraged to use their authority under subsection 50(4) of the Planning Act to deem it not to be a registered plan of subdivision and, where appropriate, amend site-specific designations and zoning accordingly.

5 4.2.2 Natural Heritage System  
1. A Natural Heritage System for the Growth Plan has been mapped by the Province to support a comprehensive, integrated, and long-term approach to planning for the protection of the region’s natural heritage and biodiversity. The Natural Heritage System for the Growth Plan excludes lands within settlement area boundaries that were approved and in effect as of July 1, 2017.

6 Growth Plan NHS Technical Report, (p. 39): Upper- and single-tier municipalities will incorporate the provincially issued NHS mapping into their official plans through a Municipal Comprehensive Review. Refinements that are consistent with the policies of the Growth Plan are as follows:

1. Minor, technical adjustments (e.g., to account for distortion from map projections, discrepancies based on map scales);  
2. Addition of natural features contiguous with the boundary of the provincially mapped NHS. When natural features are added, the boundary of the NHS will be extended to include a 30 m vegetation protection zone beyond the edge of the feature consistent with the methods used for provincial mapping (see Figure 18);  
3. Removal of small portions of the provincial NHS where there is built-up impervious development or infrastructure (that would act as barriers) that was not identified and stamped out of the provincial mapping;  
4. Removal of small, isolated portions of the NHS that protrude from the Greenbelt Plan boundary or settlement areas provided these areas have no natural features and are not connected to the larger provincial NHS.
• Indeed, there is municipal disagreement about Simcoe County’s interpretation. Innisfil Council was moved by a significant public outcry in response to seeing Simcoe County’s removals from the NHS map:

Innisfil Council resolution supports keeping outdated, non-conforming, plans of subdivision in the NHS, as mapped by the province:

December 8, 2021 Council resolution, moved by Councillor Alex Waters, passed unanimously:

• That staff be requested through the Town’s Official Plan Amendment exercise that will follow the County’s MCR process to update the Town’s Official Plan mapping to ensure environmental protection in areas of outdated plans of subdivision which do not conform to A Place to Grow, 2020;

• That staff report back to Council in advance of the completion of the MCR process on deeming subdivisions not to be registered plans of subdivision which do not conform to A Place To Grow, 2020;

• That staff submit to the County a list of sites, and a request that non-conforming, old registered plans of subdivision remain in the Growth Plan NHS and be removed from Simcoe County’s mapping; and

• That Simcoe County be requested to ensure that areas of High Quality Natural Cover in the Lake Simcoe watershed be protected by only removing from the Growth Plan Natural Heritage System approved plans of subdivision that were in settlement area boundaries as of July 1, 2017, as per the A Place to Grow policy 4.2.2. s1. and by retaining in the NHS small patches of natural cover regardless of size;
The image above illustrates our point. Big Bay Point is an area of High Quality Natural Cover as mapped by the province. None of the red takeouts (recommended presumably by Simcoe County) are approved plans of subdivision. None are contiguous with Innisfil’s settlement areas; none were registered after 1999. Some are in KNHF and KHF's. The registration on these plans of subdivision date back to 1922. Planning laws have changed since then. It is not true that these have all been through a planning process.

Why the province’s help is needed:

Simcoe County’s position on registered plans of subdivision is not supported by the technical guidance on the implementation of the NHS. They try to reassure the public and Council by saying that the natural features in plans of subdivision will be protected in their Greenlands designation. Lands in Simcoe County’s “greenlands” protection designation are often developed (ie. Lefroy, Churchill, Friday Harbour, all in Innisfil), as the level of protection in the “greenlands” designation is lower than provincial protection given today to “significant forests”, provincially significant wetlands and ANSIs, and the provincial NHS. So removing lands from the NHS and keeping them in “greenlands” protection will not achieve higher levels of protection for forest
and wetland. The province’s NHS is strong and it has to be used to the fullest here if we are to make progress on the LSPP’s Natural Heritage targets.

Please see attached the Rescue Lake Simcoe Coalition’s submission to Simcoe County, which details the geographic areas where we believe their mapping has erred in identifying plans of subdivision that have been deemed to not be plans of subdivision, or where the plans of subdivision no longer conform to the Growth Plan, or where more information is needed.

This is a serious matter that has garnered much concern in shoreline communities at Lake Simcoe. I understand that Simcoe County is asking the province for their interpretation on this matter regarding plans of subdivision. I request that this letter and attachment be forwarded, cc’ing myself, to the persons responsible for responding to Simcoe County’s question, and I request to be copied on the answer provided to Simcoe County. If there are errors in my policy analysis please advise. If the province has developed an alternative way to meet its promises, I would love to hear it.

We have asked for meetings with the Minister of Environment, Conservation and Parks since 2018. We are still asking. My contact information is below. Thank you for your attention and consideration.

Sincerely,

Claire Malcolmson
Executive Director, Rescue Lake Simcoe Coalition
rescuelakesimcoecoalition@gmail.com
647-267-7572

The Rescue Lake Simcoe Coalition is a lake-wide member-based organization, representing 29 groups in the Lake Simcoe watershed, that provides leadership and inspires people to take action to protect Lake Simcoe. www.rescuelakesimcoe.org

CC: Minister of Natural Resources and Forestry
Jennifer Keyes, MNRF
Madhu Malhotra, MOECP
Introduction and rationale for maintaining more land in the province’s NHS

In 2008 all parties unanimously supported the passage of the Lake Simcoe Protection Plan. It is now in effect but more needs to be done to achieve its objectives. For instance, the Lake Simcoe Protection Plan identifies that 40% “high quality natural cover” (HQNC) is needed to protect and restore the watershed’s ecological health. The watershed only has 28% HQNC today. A low estimate is that hundreds of thousands of dollars have been spent identifying and mapping these areas. We want them protected, not just studied. The Lake’s health depends on it.

Indeed, OUR health depends on it. We are in a climate and a biodiversity crisis. All remaining forests and wetlands on earth are critical to the survival of our ecosystems. Any removal of Natural Heritage (NH) features like forests and wetlands for development is unwise, and is contrary to the vision and targets of the Lake Simcoe Protection Plan.

The province requires municipalities to implement the Growth Plan Natural Heritage System (NHS) map via the Municipal Comprehensive Review slated to be complete by Autumn 2022.¹ Putting more natural features in the province’s new Natural Heritage System will give some green spaces MORE policy protection than they now receive. But through their mapping refinement exercise, Simcoe County has recommended more areas be removed from the province’s Natural Heritage System map than we think the province’s criteria and laws recommend. For example:

- There is a challenge acknowledged, and identified in the province’s NHS technical guidance, around the protection of NH in a highly fragmented landscape. That defines

S. 4.2.2.
the Lake Simcoe watershed and Innisfil in particular. This guidance recommends the protection of smaller patches in fragmented landscapes. Thus the undersigned are asking that North South Environmental, then Simcoe County and finally the Ministry of Environment, Conservation and Parks ensure that no small patches of natural cover that are close to, or are within, areas of “high quality natural cover” are removed from the NHS.

- Simcoe County is recommending removing 7000 sites from the NHS where there are “minor discrepancies” in mapping of areas less than 1 hectare. The rationale is ease of administration. This is not an adequate approach given the gravity of the situation. The province’s Lake Simcoe High Quality Natural Cover map provides the science and logic behind our request for keeping more of these small areas in the NHS mapping. Every undeveloped little bit of Natural Heritage in the mapped areas of HQNC must be protected. ²

- Simcoe County has taken out registered plans of subdivision from the NHS map. But some of those won’t get developed for 30 plus years, if ever. We think those should remain as the province mapped them, IN the Natural Heritage System. Registered plans of subdivision that are not going to be developed with the 2021/2022 Municipal Comprehensive Review (Official Plan) updates to 2051 should remain in the provincial NHS. As per the Growth Plan policies, if they are not contiguous with existing settlement area boundaries there is no justification at this time for their removal from the NHS as they should not be approved for development. See Growth Plan policy 5.2.8.4.³

- Simcoe County must follow the criteria for removal in the Growth Plan NHS technical guidance.⁴

---


³ A Place to Grow Act 2020 “Other implementation” policy 5.2.8.4: If a plan of subdivision or part thereof has been registered for eight years or more and does not meet the growth management objectives of this Plan, municipalities are encouraged to use their authority under subsection 50(4) of the Planning Act to deem it not to be a registered plan of subdivision and, where appropriate, amend site-specific designations and zoning accordingly.

⁴ Growth Plan NHS Technical Report, (p. 39): Upper- and single-tier municipalities will incorporate the provincially issued NHS mapping into their official plans through a Municipal Comprehensive Review. Refinements that are consistent with the policies of the Growth Plan are as follows:

1. Minor, technical adjustments (e.g., to account for distortion from map projections, discrepancies based on map scales);
2. Addition of natural features contiguous with the boundary of the provincially mapped NHS. When natural features are added, the boundary of the NHS will be extended to include a 30 m vegetation protection zone beyond the edge of the feature consistent with the methods used for provincial mapping (see Figure 18);
Simcoe County says that the natural features in plans of subdivision will be protected in their Greenlands designation. Lands in Simcoe County's "greenlands" protection designation are often developed (ie. Lefroy, Churchill, Friday Harbour, all in Innisfil), as the level of protection in the "greenlands" designation is lower than provincial protection given today to "significant forests", provincially significant wetlands and ANSIs, and the provincial NHS. So removing lands from the NHS and keeping them in "greenlands" protection is not a good way to achieve higher levels of protection for forest and wetland.

This razed forest beside Lefroy, Innisfil, was “protected” by Simcoe County’s greenlands policies.

Goals and targets must guide this exercise

Refinements of NHS mapping must aim for a net increase in protected NHS lands in Simcoe County, and must capture the entirety of all local Provincially Significant Wetlands and locally significant wetlands. This green infrastructure is integral to climate adaptation and mitigation. These also reflect the goals of the Lake Simcoe Protection Plan.

More specifically we recommend these targets:

- **Forest cover:** 50% forest cover or more of the watershed is likely to support most potential species and healthy aquatic systems. *Simcoe County has 22%, but is losing forest cover.*

- **Wetlands:** The greater of (a) 10% of each major watershed and 6% of each subwatershed, or (b) 40% of the historic watershed wetland coverage, should be protected and restored, and no net loss of wetlands. *Simcoe County has 14% wetland cover based on our analysis, and approximately half of its historic wetland cover. Simcoe County is losing wetlands.*

3. Removal of small portions of the provincial NHS where there is built-up impervious development or infrastructure (that would act as barriers) that was not identified and stamped out of the provincial mapping;

4. Removal of small, isolated portions of the NHS that protrude from the Greenbelt Plan boundary or settlement areas provided these areas have no natural features and are not connected to the larger provincial NHS.
○ Achieve the Lake Simcoe Protection Plan’s 40% High Quality Natural Cover target: Across the Lake Simcoe watershed, there is only 28% High Quality Natural Cover. This must grow, not shrink. Although we do not know what percentage of Simcoe County is High Quality Natural Cover, we know that we cannot lose any High Quality Natural Cover features. The maps have been available on Land Inventory Ontario since 2011, and can also be found here along with the technical guidance for identifying these features. This map was not used by the consultants in the preparation of Simcoe County’s Growth Plan NHS.

○ Develop a plan to actualize Simcoe County’s implementation of all Lake Simcoe Protection Plan NH targets:\(^5\)
  - No further loss of natural shorelines on Lake Simcoe
  - Achieve a greater proportion of natural vegetative cover in large high quality patches
  - Achieve a minimum 40 percent high quality natural vegetative cover in the watershed
  - Achieve protection of wetlands
  - Achieve naturalized riparian areas on Lake Simcoe and along streams
  - Restore natural areas or features
  - Achieve increased ecological health based on the status of indicator species and maintenance of natural biodiversity

  - The MNRF has mapped all Lake Simcoe watershed wetlands. It is up to the County to now apply appropriate protection through this process, and bring their mapping up to date to reflect the Lake Simcoe Protection Plan target “achieve protection of wetlands”.

  - I support the inclusion of the [LSRCA’s Natural Heritage System Restoration Strategy](https://www.simcoe.ca/Planning/Documents/Simcoe%20County%20-%20GP%20NHS%20Refinements_FINAL%20Oct%202021%20with%20Figures%20updated.pdf) recommended areas for an NHS, and the inclusion of the LSRCA’s recommended areas for restoration in the SC NHS.

  - I support the following recommendation from North South Environmental’s Review and Refinements to the Growth Plan’s NHS\(^6\) “It is anticipated that the County Official Plan will require that all draft approvals have lapsing dates and will include policies that indicate that when determining whether a draft approval should be extended for lapsing draft plans of subdivision, the policies of the Growth Plan must be considered in the development review process.” Thus we support this, and want to see the County remove old registered plans of subdivision that don’t conform to today’s policies, from the NHS.


Finally, this process must deliver on Simcoe County’s Official Plan goals which are:

- To protect, conserve, and enhance the County’s natural and cultural heritage; To achieve wise management and use of the County’s resources;
- To implement growth management to achieve lifestyle quality and efficient and cost effective municipal servicing, development and land use;
- To achieve coordinated land use planning among the County’s local municipalities and with neighbouring counties, districts, regions, and separated cities, and First Nations lands;
- To further community economic development which promotes economic sustainability in Simcoe County communities, providing employment and business opportunities; and
- To promote, protect and enhance public health and safety.

While Simcoe County’s Greenlands are vast, far too much natural heritage is “protected” by regulations that do not adequately or permanently protect a natural heritage SYSTEM of connected patches. For more information on this research see: https://rescuelakesimcoe.org/about-us/accomplishments/lake-simcoe-greenlands-project/
GEOGRAPHICALLY SPECIFIC AREAS OF CONCERN BASED ON AREAS OF HIGH QUALITY NATURAL COVER MAPPED BY THE PROVINCE

We request that the following areas identified by the Rescue Lake Simcoe Coalition and many community volunteers remain in the Natural Heritage System as mapped by the Province. They are flagged below because the Simcoe County mapping exercise proposes to remove them.

**Big Bay Point: Tiles 28 & 29**
Most of Big Bay Point was mapped and identified as “High Quality Natural Cover” by the province of Ontario in 2011; the province found that the BBP area was worthy of inclusion in the NHS. Any components of the Point that are not approved plans of subdivision must be included in the Natural Heritage System. There is no guidance in the province’s NHS Technical Criteria that suggests that registered plans of subdivision should be removed from the NHS.

Pileated Woodpecker chicks at BBP. Credit Laurie Wallace

Additional details on Big Bay Point locations of concern:

- Two areas north shore of BBP, on the edge of Barrie: Both areas are mapped as Significant Woodlands in Innisfil Natural Heritage Discussion paper Final, pg. 14. North South Environmental. These are in the High Quality Natural Cover map from the province. Indicated as “shoreline residential” with Natural Heritage overlay on Innisfil OP 2017 Land Use Schedule. Not in a settlement area.
  - Area 1 - west side - 3655 20 Sideroad, Innisfil; 3699 20 Sideroad, Innisfil, 3718 Fairway Road, Innisfil, 1344 Robinson Place, Innisfil, over to roll # 431601005411070, All of Longwood road, down to Big Bay Point rd. 3710 Strathallan Woods Lane South, Innisfil, lands southwest of Longwood, to Stathallen woods. As a whole these are all large enough to keep in the NHS.
  - Area 2 - east side - the area between the Silverbirch and Whitecap Dr subdivision, and the next NHS area. Roughly from 1215 Shoreview Drive, Innisfil

---


on the west end of this section, to along Shoreview Dr., to Guest Rd - hard to believe these are less than 50% forested. These should remain in the NHS.

- **Friday Harbour Golf Course** - put it back IN the NHS since it is large, not a subdivision, has some natural cover and could have more, and is part of a “high quality natural cover” area

- **Church compound** - 3857 30 Sideroad, Innisfil. Currently a collection of cabins, but is not a subdivision. Would like as much as possible to remain in the NHS.

- **Crescent Harbour, South corner** - landowner starting to alter landscape, may be looking to build. Crescent Harbour Rd (titled Block Plan-area and shoreline highlighted) and also Plans 675 from 1923 and Plan 1016 from 1951 that confirm the designation as a subdivision. It has not been developed.

**Leonard’s beach wetland:** 9th line and 20th sideroad, Innisfil
- Make sure this remains in the NHS.

**The Teromi property:** 3275 25th Sideroad, Innisfil
- This site is of high ecological significance and groundwater recharge whose “Future Urban” designation has been questioned by many. If the timing works, we strongly advise the Town of Innisfil to put an end date on the endless negotiations with the land owner; if he does not submit a development proposal that meets the Town’s terms as per the Dec 8th, 2021 Staff Report DSR-180-2, remove the “Future Urban” designation on the property, and add it to the NHS if possible in 2022, at least in Simcoe County’s EP 1 category, and have it included in the Growth Plan NHS at the next MCR.

**Gilford:** Tile 22
- 1284 Shore Acres Drive, Innisfil. Roll # 431601000400200. Large “unevaluated” wetland proposed to be removed - this must be protected in the NHS. It borders a large privately held conservation area at DeGrassi Point, and abuts the historic Walker Farm, a heritage site, and helps to reduce flooding in Gilford which is already a problem. It “…has been a draft plan of subdivision for executive estates since around 1986” according to the local Councillor. It is included as “estate residential” in Innisfil OP 2005 Land Use Schedule. It is not in the Gilford settlement area boundary in the 2017 Innisfil Official Plan.
Oro-Medonte: Tiles 36, 37 & 48

Almost the entire Oro Medonte shoreline is identified by the province as High Quality Natural Cover. Only remove the built up areas that are approved plans of subdivision. There is no guidance in the province’s NHS Technical Criteria that suggests that registered plans of subdivision should be removed from the NHS.

In 1988 before its amalgamation with the Township of Medonte, the Township of Oro passed By-Law 88-102 "A By-law to designate certain Plans of Subdivision not be registered Plans of Subdivision. All. OL" extinguishing several of its registered plans of subdivision including Plan 589. By-Law 88-102 is not available in the online document registry of the Township. It would be helpful if the Township of Oro-Medonte could identify the geographical areas included in the several registered plans that were extinguished in order that those areas could be appropriately protected.

Additional details on Oro-Medonte locations of concern:

Tile 48

8 Mile Point
- Has a conservation area that should be included in the NHS. They did not request that this conservation area be removed from the NHS.
- Just north of 2880 Lakeshore Rd E is the Carthew Bay Wetland. Roll #434603 001 206 500. Take care not to remove this from the NHS, and only take out the housing on Lakeshore.
- 2553, 2501, 2461 Lakeshore Rd E - these are large woodlands and should not be removed from the NHS.
- 820 Memorial Ave. Subdivision between Woodland Dr and Memorial Ace on the outskirts of Orillia. Shoreline wetland must be protected.

Tile 47

- Roll # 434603001213860 - shoreline habitat with no road access. Keep in NHS. Just west of Line 15 S.
- Just north of 538 Line 12 South, Oro-Medonte, NHS wooded area should remain in NHS. Roll # 434 60106 1044300
- 16 Taras Boulevard. Held by “Ukrainian Park”. Appear to be looking for Zoning change, from EP2 to EP1 for seasonal trailer and or cabins. ZBA 10 - but no application - This is currently forested, should remain so, is in the HQNC area mapped by the province. Does not appear to be “community area” in the Simcoe County GIS.

Tile 36

UCCI / Greenwood Forest Road - Registered Plan 51M-187, Block 43
- Residents are opposing the development; it’s a significant woodland connected to the NHS; it is mapped by the province as an area of High Quality Natural Cover; it should not be removed from the NHS.
- Not proposed as a subdivision, but it meets the criteria of a subdivision. Therefore there is no registered plan of subdivision.
- The proposed 10 proposed UCCI development lots would have these approximate addresses:
- proposed lot 9 lots on Greenwood Forest Road attached would be approximately 30 Greenwood Forest Rd (lot 9 attached) thru to lot 2 attached would be approximately 60 Greenwood Forest Road
- the one lot on Windfields (lot 1) that are situated directly beside the cold water creek would be approximately 23 or 25 Windfield Dr West
- the developer UCCI has submitted to Township of Oro Medonte in June 2020 this request:
- Applications 2020-B-04 to 2020-B-12 and Notice of Public Meeting Zoning By-law Amendment (“ZBA”) Application 2020-ZBA-05, for the lands described as Registered Plan 51M-187, Block 43, in the Township of Oro-Medonte, County of Simcoe.
- it is under consideration and not yet approved.
- 691 LINE 9 SOUTH, should remain in NHS, not developed. May be part of the same proposal.

Tile 36 other:
- Assessment # 434601000830000, just east of line 5, also unsubdivided, forested, should remain in NHS. 21 Windfields Dr.
- Near Lakeshore E and Orillia St, West of Line 7, just west of where line 8 would be, this is known as Plan 589 (Barrillia Park) which was designated not to be a registered plan by By-Law 88-102 of the former Township of Oro. Roll numbers include:

- Photo of Oro-Medonte shoreline near Greenwood Forest Rd. Credit Ed Evans
434601000955002, 434601000955001, 434601000955000, 434601000954904, 434601000954911, 434601000954912, 009-52200, 009-52201, 009-52202, 009-52203, 009-52204, 009-52205, 009-52206, 009-52207, 009-52210, 009-52211, 009-52300, 009-52301, 009-54601, 009-54700, 009-54800, 009-54900, 009-54901, 009-54902, 009-54903, 009-54904, 009-54905, 009-54906, 009-54907, 009-54908, 009-54909, 009-54911, 009-54912, 009-55000, 009-55001 and 009-55002
- This is an undeveloped subdivision contiguous with NHS, keep in the NHS.
- Red removal outline on water. Close to Line 7, 131 Lakeshore Rd. E. This marks the water lots in front of these shoreline properties. The water lots extend approximately 300 feet
out into the lake bed of Lake Simcoe and are deeded properties. Is this to remove water rights?
- Roll # 434601000935500 and 118 Lakeshore Road West, Oro-Medonte - super rare undeveloped shoreline lots - this must not be removed from the NHS. This is Shelswell Park, a municipal park! This is connected to the north to the NHS and HQNC.
- Line 2 area - Roll # 434601000711100 “Shanty Bay Church Woods”. This was saved BY THE COMMUNITY, BY RESCUE LAKE SIMCOE COALITION DIRECTOR TIM CROOKS. RIP. This must stay. It is protected by a covenant with the Couchiching Conservancy.

**Ramara: Tile 50**
There should be a buffer on the north side of the Trent river abutting the Greenbelt. Ensure that all of the province's High Quality Natural Cover is included in the province’s NHS. Only remove the built up areas that are approved plans of subdivision. There is no guidance in the province’s NHS Technical Criteria that suggests that registered plans of subdivision should be removed from the NHS.

A swath of valley land or natural area is also being removed along the border with Brock Township. Provide the justification for this or keep it in the NHS please.

**Tile 49**
Proposes removal of an important wetland swamp south of Lagoon City from protection. Residents along Lake Drive have witnessed this wetland absorb storm waters and decrease flooding for shoreline and adjacent homes and cottages during numerous storms. In this time of climate emergency, it is not wise planning to remove important natural areas from protection.

**Tiny Township:**
**Tile 53**
Request that Waverley Uplands Recharge Zone, near 40 Darby Rd. be considered for inclusion in the NHS. (Outside LS watershed, not an area of HQNC.)
Thank you for receiving our submission.

The following organizations are signatories to this submission:

AWARE Simcoe
Barrillia Park Ratepayers Association (Inc)
Crescent Harbour Association
Innisfil District Association
Innisfree Ltd.
Rescue Lake Simcoe Coalition
Simcoe County Greenbelt Coalition
Sustainable Orillia
Concerned Citizens of Ramara