

To: Simcoe County Planning and Council
Re MCR

From: Rescue Lake Simcoe Charitable Foundation
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Dear Mayors, DM's and Councillors,

I would like to congratulate staff on the presentation of an Amendment to your Official Plan which exceeds my expectations. I have never said that to Simcoe County before; this is a genuine compliment. I hope that Council will follow County staff's advice and avoid the media storm that followed both Durham and York Region's decisions to choose the BILD-promoted growth scenario at the expense of local sustainability, disregarding staff recommendations and cautions regarding the financial risks of a sprawl-heavy OP.

There are things that still worry me, but as long as the County upholds the OPA c) overall intensification of 35%, and OPA d) 51 R&J / H for greenfields, then this will represent a welcome departure and a real change to planning in Simcoe County.

I want to emphasize why we need to do these things:

1. Sprawl is expensive to service;
2. It does not address the biggest current crisis, which is housing affordability;
3. Sprawl has the biggest negative impact on our water and climate;
4. We are in a climate crisis and Lake Simcoe's health is seriously at risk.

My deputation focuses on the water quality and sustainability impacts of the OP.

In York Region, plans made in the 1990's to develop northern York Region, without water and wastewater servicing are still in limbo because the government can't decide where to put the sewage. Please do not repeat this mistake by allocating growth to areas that do not have adequate water supply or wastewater servicing.

We understand that infrastructure reports are needed at the municipal level for water, wastewater servicing, garbage, landfill, and the costs of delivering services to various areas. Environmental Assessments will be needed for any development that triggers an expansion of the sewage treatment plant.

We suggest again that in order for the spirit of various policies outlined here to be followed, and for the intent to be realized that Simcoe County should direct municipalities to work with the province on identifying first the water / wastewater constraints that exist before decisions are made about where to put the growth.

Current phosphorus loads to Lake Simcoe are more than double the ecological target of the Lake Simcoe Protection Plan. Arguably, we are already at the limit. Any additional phosphorus to Lake Simcoe works against achieving our ecological objectives for Lake Simcoe.

Below are some comments that have been made at Simcoe County Q&A Council meetings in 2022, which shape my perception of what is going on and support the assertion that this is being done backwards.

Mayor Lynn Dollin said, in a Council meeting earlier this year: “Wearing my Source Water protection hat: Our source water modeling is 10 years old. Sometimes wells affect other wells. In some places there isn’t a lot of water. What trumps what? How do we decide if we have the water / wastewater capacity to service these numbers?”

SC Planner Nathan Westendorp at the same meeting:

“This is about the LNA, in the next phase we will do more on this. Can we service the growth that’s coming? I don't think there’s a clear answer to that. Partly that's because the County doesn’t manage the water / wastewater systems, Most of the lower tiers show deficit in water or wastewater, and they will need more [paraphrase]; receiving systems can’t accommodate it - the work done to date - constraints in 20 - 30 years, including Innisfil, and they will have to look into it more; If some reallocation of growth is needed, the next update of the MCR, ten years from now can see to that.”

Planner Nick McDonald: “We anticipate that the County will work with each municipality for the accommodations; I anticipate where there are concerns about supply; detailed LSPP, Source Protection Plan, all considered in one fell swoop.”

How and when is this all happening? We would appreciate understanding how protections for water quality and natural heritage can be achieved after a decision about the allocation of growth has been made. We do not believe that it is possible to mitigate all impacts of development.

Detailed comments and recommendations:

1. Analyses must be done before growth is allocated. The Lake Simcoe Protection Plan has a designated policy that deals with settlement area expansions and sewage treatment:

LSP 4.1-DP For a proposed settlement area expansion, establishment of a new settlement area or a development proposal outside of a settlement area that **requires an increase in the existing rated capacity of a sewage treatment plant or establishment of a new sewage treatment plant**, an environmental assessment of the undertaking shall be completed or approved prior to giving any approvals for the proposal under the Planning Act or the Condominium Act, 1998.

Recommendation #1: EA's on the sewage impacts to Lake Simcoe and conformity to the LSP should precede the allocation of land for development to the Lake Simcoe watershed.

2. Despite having completed background watershed plan studies, the information available about water seems to not be used to direct growth to one area over another. One missing element is the cost of delivery of services.

Recommendation #2: Water and wastewater servicing studies that compare servicing costs of infill versus greenfield should be completed for each municipality or done at the County level prior to the allocation of growth to any municipality.

3. OPA policies are not strong enough to protect Lake Simcoe's watershed health or conform to the PPS section outlined below.

OPA f) "Require that local municipalities prepare sub-watershed plans or their equivalent when planning for the development of additional designated greenfield areas, to ensure that all elements of the natural heritage and water resource systems are considered along with climate change impacts and severe weather events";

This should be stronger, referring to the goals of the policy. I suggest those are as follows. PPS policy that must be met is detailed in the excerpts of the PPS copied below.

Recommendation #3: Reword as follows (change in bold font):

OPA f) Require that local municipalities prepare sub-watershed plans or their equivalent when planning for the development of additional designated greenfield areas, to ensure that all elements of the natural heritage and water resource systems are **protected, that no loss of**

forest or wetland occur, and that climate change impacts and severe weather events influence decisions about where to allocate growth;

Provincial Policy Statement S. 2.1 Natural Heritage

2.1.1 Natural features and areas shall be protected for the long term.

2.1.2 The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.

2.1.8 Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 2.1.4, 2.1.5, and 2.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.

4. We are concerned that stormwater could be overlooked as a source of pollution. Nearly 30% of the phosphorus load which pollutes Lake Simcoe annually come from stormwater.

Recommendation #4. The analysis of water and waste water impacts and costs long term must consider stormwater management, and long term upkeep.

Provincial Policy Statement S. 1.6.6 Sewage, Water and Stormwater

1.6.6.1 Planning for *sewage and water services* shall:

a) accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing:

1. *municipal sewage services and municipal water services*; and
2. *private communal sewage services and private communal water services*, where *municipal sewage services and municipal water services* are not available or feasible;

b) ensure that these systems are provided in a manner that:

1. can be sustained by the water resources upon which such services rely;
2. prepares for the *impacts of a changing climate*;
3. is feasible and financially viable over their lifecycle; and
4. protects human health and safety, and the natural environment;

c) promote water conservation and water use efficiency;

d) integrate servicing and land use considerations at all stages of the planning process; and

e) be in accordance

1.6.6.7 Planning for stormwater management shall:

- a) be integrated with planning for *sewage and water services* and ensure that systems are optimized, feasible and financially viable over the long term;
- b) minimize, or, where possible, prevent increases in contaminant loads;
- c) minimize erosion and changes in water balance, and prepare for the *impacts of a changing climate* through the effective management of stormwater, including the use of *green infrastructure*;
- d) mitigate risks to human health, safety, property

5. Communal servicing is full of risks. Use only as a last resort!

While we know that the province now allows communal wastewater servicing, please consider the bind that Ramara finds itself in. Ramara is now advocating for a new and completely unaffordable wastewater treatment system because their communal system has reached capacity, and has been in violation of provincial pollution regulations for some time.

Recommendation #5: Only use communal wastewater services if there is absolutely no other option. There is a lot of risk to the municipality and to the environment from using these stand-alone systems.

See S. 1.6.6 Sewage, Water and Stormwater above

Thank you for your time,

Claire Malcolmson

On behalf of the Rescue Lake Simcoe Coalition