

September 26, 2009

Ontario Growth Secretariat
Ministry of Energy and Infrastructure
777 Bay Street, 4th Floor, Suite 425
Toronto, Ontario
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Dear Sir/Madam:

Thank you for the invitation to comment on the report “Simcoe Area: A Strategic Vision for Growth (the “Strategy”).

The “Simcoe Area: Strategic Vision for Growth” represents the most important decision point in the modern era of land use planning in Ontario. This is because although it has three much needed and progressive elements, that being growing Barrie, preparation of a tourism/recreational policy framework and establishment of a regional servicing body, the cumulative effects of growing Barrie in combination with redirecting population to Bradford and Alliston and the creation of extensive new employment areas along Highway 400 will leapfrog the Greenbelt and open up a new frontier of major urbanization in south Simcoe County.

Such an outcome is completely incongruent with the overall vision for central Ontario which has been in place since the 1960’s and the inception of provincial planning in Ontario. Moreover, this vision has recently been embraced and reaffirmed through the award winning and internationally recognized Greenbelt Plan, Growth Plan and Lake Simcoe Protection Plan – all of which have allowed Ontario to once again become a world leader.

These two elements of the Strategy are “simcoe-centric” and result in a case of the proposed vision for south Simcoe County undermining the overall vision for the Greater Golden Horseshoe.

As such, while the Strategy’s proposal to establish a nodal based community structure is sound in theory, let’s review some of the key economic and environmental imperatives which underscore why these two key elements of the Simcoe Strategy are completely ill-suited to the central Ontario landscape.

Lake Simcoe

The Amethyst Award winning Inter-Governmental Action Plan for Simcoe County (IGAP), Barrie and Orillia clearly confirmed that Lake Simcoe is significantly degraded and facing increased damage on the basis of currently existing approved development

without upwards of \$200 million of remediation. It corroborated that the practice of approving large amounts of land for urbanization without consideration or demonstration of servicing was a major factor in creating this problem.

It demonstrated that Lake Simcoe is a shared resource with communities in 2 regions, 2 cities and a number of lower tier municipalities, towns and villages (14 in total) all relying on the lake for either water supply or sewage disposal or both – and all of which participated in IGAP.

Lastly, it confirmed that storm water run-off from urbanization generates almost 4 times the loading of phosphorus to the lake compared to sewage treatment plant discharges (which is completely in keeping with overall research in the Great Lakes basin)

Lake Simcoe Protection Act and Plan

The above, together with the stark realization that Lake Simcoe has finite capacity to provide water and assimilate sewage and storm water, led to the June 2009 enactment of the award winning Lake Simcoe Protection Plan.

Two of the three key elements of this award winning plan are to place caps on the sewage treatment plants discharging to Lake Simcoe and to require any urban expansion to be supported by an approved environmental assessment for servicing (sewer, water and stormwater), which is also required within the Greenbelt Plan for the same reasons.

Most notably, the Plan, for the first time in Ontario, if not Canada, and similar to carbon trading concepts, calls for the establishment of a phosphorus trading framework. This clearly recognizes the finite assimilative capacity of the lake and the fact that this resource is going to have to be “allocated” because it cannot accommodate all the demands upon it.

The reallocation of population to Bradford and Alliston together with the designation of proposed new employment areas on Highway 400 run contrary to all of the above. This is because there have been no environmental assessment(s) to demonstrate that these proposals can proceed in the context of the capacity of the lake and the framework for cumulative impact analysis and phosphorus trading/allocation has not yet been established (in which to assess any environmental assessment). Designating more land in the absence of the environmental assessments and framework perpetuates the very pattern of activity that led to this situation in the first instance and runs contrary to the Lake Simcoe Protection Plan. A “first come first served” approach is not democratic and not conducive to appropriate prioritization of multiple demands on this resource.

At a central Ontario scale, south Simcoe County, long known as the “jewel in the crown”, is completely ill-suited for major urbanization as the Lake Simcoe and Nottawasaga Basins are small and slow moving receiving bodies which simply cannot sustain the environmental impacts associated with what is a “GTA scale” of urbanization. Further, these proposals are concentrated in the middle-upper reaches of both basins meaning all

contaminants will flow through the majority of these watersheds and beyond – which in the case of Lake Simcoe means into the much smaller Lake Couchiching and Severn River. Indeed, history clearly shows major urbanization in central Ontario has been directed to the shores of the Great Lakes rather than inland lakes and rivers. To this end, provincial thinking from the 1960's identified the Georgian Bay shoreline communities as the most appropriate location for urbanization within the County (should it be needed/occur).

Lack of Need

There is absolutely no truth to the proposition that Simcoe needs to accommodate more development due to land constraints in the GTA. Over 75% of the overall growth to 2031 is directed to the Greater Toronto Area and Hamilton (GTA), 15% to Waterloo and south/west, while only about 7.5% is directed to Simcoe County. The decision to direct and focus growth in this manner was a conscious policy-led vision which recognized the diversified economies, the plethora of existing and planned hard and soft infrastructure, the provincial plans to focus on transit investments and the significant impacts on the agricultural resources in these areas from existing urbanization and development speculation.

The GTA currently has over 85,000 acres of greenfield land already approved for urbanization. Collectively, the GTA municipalities are seeking about another 30,000 acres to accommodate the forecasted growth to 2031. Further, this 30,000 additional acres represents only about 22% of the 140,000 acre whitebelt which was left out of the Greenbelt in order to provide several generations of land for growth. As such, the “whitebelt” is working exactly as planned and could accommodate millions more people and jobs before it would be necessary to pursue major urbanization in the “outer ring”.

At a county level, in 2006 the combined population of Simcoe County, Barrie and Orillia was about 437,000. The Growth Plan forecasts this to increase by about 230,000 to 667,000 people with Barrie and Orillia accounting for almost 40% of this. This leaves the County with a growth forecast of about 165,000 person to the year 2031 (assuming Barrie does not grow). However, The County's recently completed land budget shows it has enough greenfield land already approved to accommodate over 100,000 people more than this while also showing that it has sufficient employment land to accommodate the job forecast within the Growth Plan. As such, with roughly 60-70% more land than it needs, there is absolutely no need or justification for considering further urban expansions or employment areas at this time (with the exception of Barrie, which should be considered for additional growth allocation and annexation/urban expansion in order to reaffirm its role as the regional centre).

More specifically, from an employment land perspective, work undertaken by the GTA municipalities reveals there are currently about 30,000 acres of vacant, approved employment lands. They identify a need of only about 11,000 acres of additional employment land. The two proposed employment areas have a combined area of upwards of 4,000 acres.

Leveraging Approved Employment Lands and “Spreading the Jam too thin”

The other reality is that there is finite demand for this type of employment land – just as there is for major office or commercial development. Designating new supplies in these locations is “spreading the jam too thin” and ignores some of the major approved and planned employment areas within Simcoe County itself and northern York Region.

On the latter point, Bradford already has about 1,000 acres of approved, vacant employment land. Keswick recently had 600 acres approved. Queensville has over 1,000 acres and York recently adopted a new 2,000 acre employment area on both sides of Highway 400 running right up to the south edge of the Greenbelt. These existing and planned employment areas have been planned to be fully integrated with the existing communities and, when combined with other approved lands, including those in Innisfil, Barrie and Alliston, provide ample supply in this vicinity.

The Queensville and Keswick lands are tied to the extension of Highway 404 while also located and planned to take advantage of the EA approved Bradford By-pass. The Bradford lands were specifically planned along the route of the Bradford By-pass and interchange locations. The By-pass, while not envisaged as proceeding in the Growth Plan, is a critical piece of infrastructure linking Highway 400 to Highway 404. It is fundamental to the urban structure of York Region and central Ontario while also a key driver of growth for the Bradford, Queensville and Keswick employment areas. Further consideration needs to be given to this overall situation prior to essentially freezing the existing Bradford employment lands, which have been developing and attracting employment uses, and opening up huge new tracts of employment lands isolated from any community and fraught with problems as set out in this commentary.

This has serious implications for infrastructure funding as there needs to be a critical mass in order to provide some certainty that development charges will materialize if the municipality front ends the infrastructure or a critical mass of development interests willing to do the front-ending themselves. Clearly, this is a significant risk given our infrastructure gap and the annual funds Ontario taxpayers forward to municipalities to help fill this gap (see more detailed discussion below). The risk is clearly heightened given the recession and the evolution of the economy in which there will an ever decreasing number of our jobs located on employment lands.

This is analogous to the Growth Plan only identifying 26 nodes or urban growth centres in the GGH whereas previously there were 52. This was done specifically because there was not enough major office and commercial demand to support 52 nodes. The same rationale applies to employment lands and the approach of “designate and they will come” is not an appropriate model to follow from a fiscal or urban structure perspective.

The likely outcome will be a move to allow major big box retail on these employment lands – which in turn negates the primary rationale for designating these lands for employment purposes in the first instance (ie. access to highways). This in turn will

create the potential for significant reductions in functionality of the highway given the intensity of consumer car traffic associated with big box developments (eg. Molson Park in Barrie). Alternatively, there will be proposals to convert these lands to residential – with both scenarios clearly currently playing themselves out in the GTAH.

Conversion to major retail uses will exacerbate the urban structure problems with these proposals as they are well removed from any residential communities and will not be served in any meaningful way by transit.

Location

The Strategy proposes these new employment areas given their location on a single 400 series highway. This is contrary to the current research which concluded that the GTAH, and particularly western York, Peel, Halton, Hamilton (and Waterloo), are the most appropriate locations for major employment lands given the density of existing and planned infrastructure. More specifically, that geography has an existing grid of multiple 400 series highways along with current planning (environmental assessments are underway) for more. It is home to the 3 existing international airports in the GGH, existing and planned major inter-modal rail yards and the ports of Toronto and Hamilton. This geography is also most proximate to the U.S. and the border crossings, which are also subject to huge investments by both the federal and provincial governments to improve the capacity for goods and services to move from the GTAH to the U.S.

Moreover, substantial portions of the existing and proposed new supply of employment lands in the GTAH are located on or near 400 series highways. With 140,000 acres of “whitebelt”, there is ample opportunity to provide for the new supply in the GTAH in prime locations adjacent to highways corridors, airports, railways and major rail yards described above. As such, even if there were need for additional employment lands, an agricultural/rural area, with significant assimilative capacity constraints on inland lakes and rivers, and only one single 400 series highway, well removed from our major trading destination, is not the appropriate location.

Urban Structure

One of the main thrusts of the Growth Plan is to plan “complete” communities. The proposed employment areas are spatially separated from the major residential communities (Alcona, Bradford) they are intended to serve. They are completely isolated from those communities and there will not any ability in the long-term foreseeable future to effectively integrate them and create complete communities where people can meet their daily needs (working and living) by walking, cycling or taking transit.

Not only are these proposed employment areas leap-frogging the Greenbelt, they are leapfrogging the logical and contiguous expansion of the communities of Bradford and Alcona – all of which runs contrary to provincial policy and sound infrastructure and fiscal planning.

Lastly, there is no “long-term” urban structure vision associated with these proposed employment areas. Rather, what will happen by default is that there will be tremendous pressures to fill in the “gaps” between the existing communities and these areas – where the proposed pipelines to service these employment areas are intended to traverse. This will only exacerbate the problems discussed in this commentary while also promoting more incremental planning.

Pipelines

In addition to the fundamental assimilative capacity issues discussed above, in order to facilitate this leapfrogging, the southerly proposed employment area would necessitate the extension of a 3 – 6 kilometers pipeline from Bradford, across prime agricultural lands to and beyond Highway 400 to the village of Bondhead and west of Highway 27. The northerly employment area would necessitate a pipeline being extended 8 – 10 kilometres, again across prime agricultural land, from Alcona to Highway 400 and beyond.

Recall Bradford West Gwillimbury and Innisfil are rural/agricultural townships of 25,000 and 32,000 people respectively with the actual communities of Bradford and Alcona substantially smaller than the overall populations. The scale, costs and spatial extent of the proposed pipeline extensions is unprecedented in central Ontario in general and certainly unheard of for small municipalities like those involved.

Where there have been such initiatives, they were undertaken to address prior failures or to rationalize historic incremental schemes such as these and were undertaken by sophisticated regional municipalities with extensive financial resources and administrative capacity. In hindsight, the costs and efforts associated with these are leading to significant reservations and efforts prevent reoccurrences today.

This needs to be considered in light of the fact that the County of Simcoe has no authority for sewer and water and that various lower tiers continue to attempt incremental and disjointed servicing agreements amongst themselves while others assume capacity within their systems far beyond what they can accommodate. IGAP clearly demonstrated that the capacity in every single sewage treatment plant in Simcoe County is fully allocated with large tracts of approved land still without approved servicing. Yet, several municipalities continue to approve or propose further urbanization in the face of the documented problems uncovered in IGAP and despite the requirements of the Lake Simcoe Protection Act/Plan. The Simcoe Strategy proposes to continue the very pattern of forwarding land use approvals in advance and/or without servicing approvals.

As a last note, certain development interests/municipalities are trying to circumvent this servicing and assimilative capacity gap by advancing communal subsurface sewage disposal systems for approved solely under the *Planning Act*. Communal subsurface disposal systems should not be allowed for major development in or the expansion of any settlement area.

The historic approach has been one of a “promissory note” that new technology will allow these urbanization aspirations to be realized by improving treatment. This formed part of the basis for the approval of Big Bay Point and yet there is no certainty in the absence of environmental assessments that the technology will be acceptable – and there is to be a sufficient period of monitoring if it is should be implemented – to determine if they are functioning as advertised. Clearly, current approvals based on new technologies need to be implemented and monitored prior to further approvals based on the same technology.

The “contingency plan” being advanced by certain development interests in Simcoe is a proposition whereby there would be a “big pipe” running in a loop from Collingwood down to Alliston, east to Bradford and then back north through the various communities to Georgian Bay. The approval of extensive new urban expansion and employment lands in the face of the findings of IGAP and the Lake Simcoe Protection Plan will only fuel this.

The problem with the “big pipe” is threefold. First, IGAP and other research clearly shows that sewage treatment plant discharges only comprise just over 20% of the phosphorus created by urbanization. The remainder is from urban run-off. It is the mere paving of the landscape that has, in all instances, as demonstrated through every watershed study in Ontario, led to significant environmental degradation.

Second, there is absolutely no certainty that Georgian Bay can assimilate the effluent from the cumulative flows of all these communities. In particular, the prevailing winds are from the northwest, which would regularly push the effluent discharge shorewards to Wasaga Beach – the world’s largest freshwater beach and a priceless tourism/recreational resource which is a key economic driver of the north Simcoe economy.

Third, this scale of pipeline is enormously expensive, prone to significant environmental impacts both during construction and operationally, and inherently, promotes even further urbanization in order to pay for the significant costs. In Simcoe County, it would also entail substantial ongoing mechanical pumping given the relatively flat landscape.

Put simply, Ontario cannot afford to entertain another major sewage pipeline initiative. Research in recent years has clearly demonstrated that our financial models for infrastructure and land use planning are seriously flawed. We have a \$130 billion dollar infrastructure gap in Canada and a multi-billion dollar gap in Ontario. York Region, one of the most sophisticated upper tiers in Ontario, is looking at increasing its debt ratio above provincial standards given the enormous infrastructure costs it is facing – including sewer and water to make up for past incremental and short sighted planning.

Ironically and sadly, Ontarians and Canadians are respectively going into debt to the tune of 10’s of billions of dollars in large part to try to narrow this infrastructure gap as an economic stimulus response to the recession. And yet this doesn’t come close to meeting our documented needs – let alone any new ones. Without this stimulus spending, it is

difficult to contemplate how far behind we would continue to slip or how long it would take to close this gap.

Yet these debt loads are going to likely severely compromise the ability to make any further headway as balancing the books will be the first priority. Any big pipe solution to facilitate these proposals represents a significant long-term risk to all Ontario taxpayers and it is for this very reason that one of the fundamental directions of the Growth Plan is to fully utilize all existing and planned infrastructure capacity prior to considering the development, expansion or extension of new infrastructure. And it is for this reason why the 90% of the growth is directed to the GTA and southwest.

Given all of the above, and the fact Simcoe is only to accommodate 7.5% of the growth, it makes absolutely no sense to even consider a “big pipe”. Rather, the approach, as laid out in both the Greenbelt and Lake Simcoe Protection Plan, is that these inland communities should only grow to the extent they can provide locally sustainable sewage and water services.

Lastly, even if there were the financial capacity for a new “big pipe”, the Region of Waterloo is clearly a much greater priority given it is facing assimilative capacity limits in the Grand River and yet it is in a much better position and identified for growth given its concentrated urban structure of almost a half million people, diversified economy, existing infrastructure (hard and soft) – including an international airport, multiple universities/colleges and hospitals – plans for light rail and its strategic location in relation to our major trade corridor and border crossings.

History Repeating Itself

The current situation is very similar to what was occurring in York Region and the Yonge Street corridor beginning in the 1970’s and continuing for over 2 decades. Major development interests speculated in land in what were then small and rural municipalities. Extensive amounts of land were approved for development without approval of servicing. This has ultimately led to planned extensions of the YDSS to communities like Whitchurch, King City and Queensville at tremendous cost and significant environmental impacts.

The evolutionary process is also quite similar to what occurred in York Region in particular in that major development interests are leading the way through speculative real estate “securement”, rather than following pre-established plans. Further, the pattern has been for this to occur in predominantly small, rural communities with little capacity or experience in this scale of urbanization. This has led to “GTA” scale development proposals being forwarded in New Tecumseth, BWG and Innisfil. To amend the award winning Growth Plan and dramatically change the GGH vision to facilitate these speculative real estate transactions runs contrary to the planned and policy led vision for the GGH.

Major Development Proposals and Existing Planning Approvals

To underscore this point, one only need look at the corresponding map of major development proposals which have been forwarded by either development interests or individual local municipalities. Collectively, these proposals anticipate about another 165,000 persons and 50,000 jobs above the forecast for the County as set out in the Growth Plan. They also contemplate the urbanization of about another 20,000 acres of land despite the fact the County already has enough land to accommodate over 100,000 people more than its growth forecast.

While it is acknowledged that Barrie does not have enough land to accommodate what should be its share of growth as the regional centre, and that some of the land subject of these development proposals may actually provide for some of Barrie's need, there is still no justification for any of the remaining proposals beyond Barrie's needs.

However, the Strategy contains no discussion of these proposals or any direction on how they would be addressed.

With respect to the existing oversupply of approved land, the Strategy raises the notion of some sort of phasing strategy. While this should be explored, there is no discussion of what it might look like or how it might work. Further, the Strategy exacerbates the oversupply situation by actually contemplating further urban expansion for the southern communities to which it proposes to reallocate growth while also designating thousands of acres of new employment areas. Given the oversupply and above issues, any phasing strategy should focus on the staging of currently approved lands which comprise the 100,000+ person oversupply.

From a municipal perspective, there has been significant land use, infrastructure and capital planning by both the municipalities and private sector interests in the communities from which the Strategy proposes to reallocate population and jobs. There is no information on the status of these approvals and plans and this could cause significant problems for both the municipalities and development interests affected. As such, current approvals should be maintained and phasing focussed on those areas where there are no approvals beyond simply being within an urban boundary.

Transportation

From a transportation perspective, directing 75% of the growth to the GTAH was to also allow for the pursuit and implementation of higher order transit and capitalize on the huge expenditure in existing and planned 400 series highway links. It also recognizes that we can never build enough highways or roads to support the dispersed urban footprint (sprawl) that we have historically allowed to occur and thus need to focus the vast majority of our future efforts and land use planning on transit supportive communities.

Metrolinx' Regional Transportation Plan contemplates extensive new transportation, primarily transit, improvements in the GTAH, in the order of \$50 billion. Highlights include two subway extensions, extensive light rapid transit in Toronto, York, Peel and

potentially in Hamilton (and Waterloo), along with other major transit and GO projects. Other than a GO service to Bradford and Barrie, there is virtually no proposed investment in Simcoe County. This is reflective of the fact that only 7.5% of the growth is allocated to Simcoe and that the County's urban structure is not conducive to transit investment.

Outside of Barrie, there is no transit in Simcoe County and likely to be virtually none for the foreseeable future. The proposed employment areas will not be served by transit and likely never will be given their isolation from any community. Moreover, they will create a significant reduction in the function of the existing transportation network and particularly Highway 400. Experience in Barrie has clearly shown that lining Highway 400 with commercial/industrial development has effectively turned this inter-regional corridor into a local arterial road at best, with significant levels of congestion.

Allowing thousands of acres of new urban development around Innisfil Beach Road and Highway 88 and 400 will effectively eradicate the ability of Highway 400 to function as the main artery between Barrie and the GTA. In doing so, it will lead to an increase in all the problems the Government is trying to address through its Regional Transportation Plan (ie. less gridlock for business, less commuting and more family time for workers, less air pollution, and a walkable/cycling design for "complete communities"). This in turn will lead to calls for new highway infrastructure – and a resurrection of the proposed extension of highway 427 across the Oak Ridges Moraine and Greenbelt into south Simcoe County. From an economic perspective, Ontario simply cannot not afford another major transportation corridor given priorities in the GTA at this time and thus can/should not afford to be backed into that scenario.

Agriculture

South Simcoe County is highly predominated by Class 1 soils and southern Ontario has 50% of all the Class 1 soils in Canada. It is a highly intact, productive and functional agricultural region which will be severely destabilized, in a number of ways, by further allocation of population to the southern communities together with the proposed employment areas.

First, these elements of the Strategy would convert thousands of acres of prime agricultural land to urban uses – without any justified need while also leading to increased fragmentation of the agricultural land base.

Second, the linear and isolated nature of the employment areas in particular will create a much longer agricultural/urban interface than locating employment areas within and contiguous to existing communities (such as the employment area approved in Bradford). This in turn will lead to an increased influence zone of agricultural/urban conflicts in terms of noise, odour, dust and a much larger area of impact given all east/west movements to and from these employment areas will need to cross agricultural lands.

Third, the Strategy will promote further speculation by non-agricultural interests in general, and will certainly lead to tremendous speculative pressures on those prime

agricultural lands across/under which the proposed pipelines are to run. This in turn will spiral more broadly into even further speculative pressure, more absentee ownership, less investment in agricultural infrastructure and a general waning of the agricultural economy and support businesses in the south Simcoe County – just as has been fully documented in the GTAH.

Looking at this from the GGH perspective, while the Greenbelt protects significant tracts of prime agricultural areas, the 140,000 acre “whitebelt” (the area between the existing urban boundaries and the Greenbelt) was simultaneously identified as the major additional area of prime agricultural lands that should be considered for urbanization over the long-term.

This was because of:

- the level of ownership by the development sector and corresponding absentee ownership ;
- the lack of agricultural investment (fencing, barns, drainage etc.) in expectation of urbanization;
- the significant conflicts on the roads between urban dwellers/commuters and farm equipment;
- the lack of supporting agricultural businesses – the majority of which have moved to the outer ring to avoid the urban conflicts; and
- the fact that this is where the bulk of people, jobs and infrastructure exist.

One of the most difficult decisions in regards to the Greenbelt was related to the size of the whitebelt, given the lands below the Oak Ridges Moraine and Niagara Escarpment are some of the most productive lands in Ontario and some of the most productive in Canada. This choice was contingent upon not only protecting the agricultural lands within the Greenbelt, including the specialty crop areas of the Niagara Peninsula and the Holland Marsh, **but also the restriction of major new urbanization leapfrogging the Greenbelt into other exurban prime agricultural areas** – with the population and employment forecasts in the Growth Plan as the levers to control this growth.

Agriculture is a significant economic generator in Ontario and with almost 3.5 million more persons expected by 2031 and greater emphasis on local food production for security and energy cost reasons, there is tremendous opportunity for this to be a significant growth sector. The Strategy threatens the ability of the south Simcoe agricultural region to fulfill this potential.

Amending the Growth Plan only 3 years subject to its enactment to directly undermine the overall vision for the GGH is ill-conceived and completely premature. Given the absolute lack of need (both at a GTAH and Simcoe level) and the plethora of challenges discussed above, it makes absolutely no sense to destabilize what is effectively the last major agricultural region in the central portion of the Greater Golden Horseshoe.

Greenbelt

Simcoe County was always recommended by provincial staff to be included within the Greenbelt Study Area given the development pressures and the agricultural and natural resources including Lake Simcoe and its basin.

Based on the criteria established by the GB Task Force, south Simcoe in its entirety would have been included in the GB given it clearly meets the agricultural and environmental criteria and given it would have helped frame the urban structure for central Ontario consistent with the vision as set out in the GB and Growth Plans.

Governance Capacity

The land use planning system in Ontario relies heavily on municipal governments for both planning and implementation – including the provision of sewer, water and transportation.

History has shown that those municipal jurisdictions targeted for major urbanization require an experienced, multi-disciplinary and knowledgeable bureaucracy which can integrate land use planning with engineering and fiscal management. This entails that the subject municipalities have the appropriate legislative responsibility for these functions and that is why the regions were created with specific legislation.

This is clearly recognized in the Strategy in its call for the creation of a regional servicing body. However, while the concept is sound, it is incomplete for all experience and practice has demonstrated that servicing and land use need to be undertaken by a single agency in order to ensure appropriate integration and accountability with respect to the fiscal/capital planning and priority setting – overseen by elected representatives. As such, the only appropriate option for this responsibility is the County itself and it should be given this authority (with the exception of Barrie and Orillia – which can be considered at a subsequent time).

Currently, Simcoe County simply does not have the legislative authority or staff capacity or experience to manage sewer and water systems. Even with legislative authority, it will be some time prior to it being able to deal effectively with the existing, let alone proposed expansion to new systems. There should be no further land use approvals for urban expansions or major urban uses requiring sewer and water (ie. the employment areas) on inland lakes and rivers beyond those currently in place (with the exception of Barrie and) until the County is provided with this authority. The Strategy is inhibiting the ability of the County to effectively determine the best path forward in relation to servicing and environmental impact by proposing new employment areas and population reallocations in the absence of any servicing confirmation.

Conclusion

The McQuinty government has been the most progressive regime in the history of Ontario with respect to growth and resource management, with the Ministry of Energy and Infrastructure and the Ontario Growth Secretariat being key leaders on a number of these initiatives. From the Boreal Forest to the Great Lakes to Clean Water, Endangered Species and Green Energy, the efforts to optimize sustainable management frameworks are unparalleled. Sub-provincially, but still continental and global at certain scales, the Greenbelt, Growth Plan, Central Pickering and Regional Transportation Plans have been internationally and continentally recognized widely as leadership at its finest.

While the Strategy's general call for regional servicing and the vision to expand Barrie and reinforce it as the regional centre for the County are sound and in keeping with the GGH vision, the reallocation of population and establishment of new employment areas along Highway 400 are at direct odds with the award winning vision for central Ontario as set out in the Greenbelt, Growth and Lake Simcoe Protection Plans.

In fact, the cumulative effect will be to open up a new linear pattern of urban sprawl along highway 400 running virtually from the Holland Marsh to north of Barrie, a pattern strikingly similar to the Yonge Street corridor, and a pattern in both York and Simcoe which these provincial plans were directly intended to prevent from happening again.

It will bind future generations to an unsustainable and inefficient pattern of sprawl which undermines all the Government's leading edge efforts and financial investments to date; destabilize a major agricultural region; and lead to irreversible further negative impacts on Lake Simcoe. Further, the "big pipe" contingency plan currently being floated has extreme uncertainty from both an environmental and fiscal perspective with significant risks from both to Ontario taxpayers. As such, the Simcoe Strategy should focus squarely on having the County, Barrie and Orillia manage what is already on the books – up to the maximum of the overall Growth Plan forecast for these 3 municipalities.

The bottom line is neither the Lake Simcoe or Nottawasaga Basins are appropriate for major urbanization from an environmental perspective and thus there needs to be a reconsideration of the "Strategic Vision for Growth". The vision for growth should be a continuation of the existing one of a agricultural/rural/recreational/tourism landscape and economy rather than a vision of major urbanization akin to the GTAH.

Given that Simcoe already has more than enough approved land to accommodate its growth for well over 25 years and 100,000 people more than its growth plan forecast, there is absolutely is no reason or rush to consider any further urban expansions or new development areas in south Simcoe County (outside of Barrie) and many reasons not to.

Based on the above, following is an alternative path for the Simcoe Strategy:

1. Proceed with all Lake Simcoe Protection Act regulations and implementation measures.
2. Prioritize establishing a framework for cumulative impact analysis of sewage treatment and water taking and the creation of a body to consider phosphorus trading

- with responsibility for allocation of the resource (with representatives from all municipalities in the basin).
3. Proceed with the Barrie/Innisfil annexation and allow Barrie to proceed with considering an urban expansion subject to environmental assessments for sewer, water and stormwater (the results of which will be subject to the cumulative impact assessment framework and oversight body described above).
 4. Pursue legislative change to provide the County with responsibility for sewer and water services (subject to allowing Barrie and Orillia maintaining their current responsibilities in the short to mid term). Consider a phased approach whereby the authority would first encompass all inland systems, leaving Georgian Bay based systems as a second phase (with Barrie and Orillia)
 5. Prohibit any further urban expansions on inland lakes or rivers beyond Barrie pending completion of all required environmental assessments for currently approved urban lands and their consideration through the oversight cumulative impact and allocation body described above.
 6. Further consider the role of the EA approved Bradford By-pass and its intended function to support employment land growth in Bradford, Keswick and Queensville.
 7. Grow the Greenbelt through the inclusion of most of south Simcoe County or entrench a Simcoe specific Vision of the Simcoe County as an agricultural/rural and recreational/tourism area with modest growth of towns/villages and a sole regional centre of Barrie.
 8. Prepare an economic opportunities plan/strategy based on the above vision and consider the preparation of additional policy framework on recreational, tourism, resort uses etc. to help realize or implement this vision.
 9. Create a framework which only allows municipalities to move forward with planning for growth which is within the County forecast as set out in the Growth Plan (ie. no further secondary or subdivision planning to proceed for those lands which already exceed the oversupply of land for Simcoe – ie. unless it has already occurred).
 10. Establish a broad, grass roots based visioning process for central Ontario relying on a multi-jurisdictional, multi-generational and multi-dimensional (stakeholders and media – using Windows 2.0 and educational system as much as possible).
 11. Require watershed/subwatershed plans prior to any further urban expansions.
 12. Review and enhance as needed the existing monitoring program to obtain detailed information on the state of the lake and the effectiveness of sewage and storm water technology. A requirement for 5 years of data should be imposed prior to considering any further urban expansions. This will allow time for the County to assume servicing responsibility and acknowledges that the extensive supply of approved urban lands that already exist.
 13. Require the preparation of an adaptive management plan to address problems identified through the monitoring program.

Sincerely,

Victor Doyle, M.C.I.P., R.P.P.

Summary of Issues

1. Lake Simcoe and Nottawasaga River are too small and slow moving receiving bodies to ever be capable of sustainably accommodating substantial urbanization.
2. Represents leap-frogging of Greenbelt and local communities.
3. Undermines Growth Plan and overall 50 year vision for central Ontario.
4. Incongruent with Lake Simcoe Protection Act and Plan.
5. Undermines Regional Transportation Plan and major funding associated therewith.
6. Ignores InterGovernmental Action Plan by perpetuating the approval of land use designations in the absence of confirmed sewer and water.
7. Ignores IGAP by continuing to approve development when it was identified Lake Simcoe will continue to experience significant degradation without upwards of \$160 million in remediation just from approved development.
8. Represents non-contiguous development within the County as a whole with multiple pipeline proposals extending many kilometres from Lake Simcoe all the way west to Highways 400 and 27.
9. Relies on small, rural municipalities to plan, operate and maintain these major pipeline systems.
10. Destabilizes a major agricultural region.
11. Creates several “no mans lands” through the configuration of the proposed employment areas where agriculture will wain leading to new pressures to “fill in” the gaps.
12. Lake Simcoe and the Nottawasaga River have limited assimilative and water taking capacity and there are more demands than can be accommodated and yet no body or framework to consider cumulative impact analysis and allocation of the resource.
13. From a priority perspective, existing major development approvals in Barrie, the community of Bradford and East Gwillimbury and Georgina should take precedence – followed by other approved development and then recreational/agricultural use.
14. It ignores the significant supply already in the basin.