

March 2, 2018

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

Dear sir;

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

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

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

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

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

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

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

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

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

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

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

Natural Heritage Concerns with the County ERRC Proposal

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

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

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

Conclusions

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

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

Sincerely,



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

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