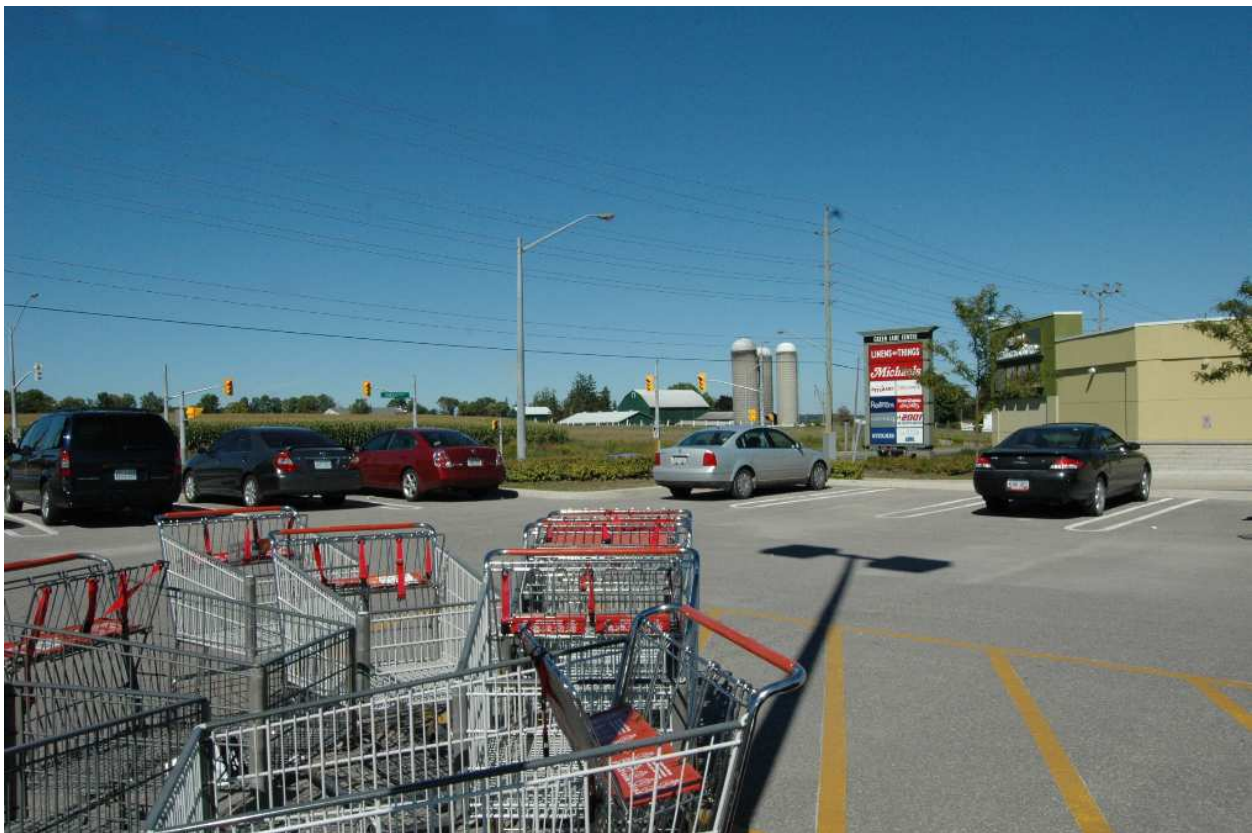


Paving Simcoe County

Campaign Lake Simcoe's Response to *Simcoe Area: A Strategic Vision for Growth*

August 2009



Campaign Lake Simcoe

Executive Summary

Minister Jim Watson's *Simcoe Area: A Strategic Vision for Growth* (referred to as "*Growth Strategy*") dismantles *Places to Grow* (2005), weakens and undermines the *Greenbelt Plan* (2005), and seriously limits the effectiveness of the *Lake Simcoe Protection Plan* (LSPP) (2009). Campaign Lake Simcoe, which has advocated for the protection of the Lake Simcoe Watershed since 2005, is shocked that this government has put forth for consultation such a dismal "Vision" for an area of such great ecological, agricultural, recreational value.

This "consultation" is also one of the worst examples of a "sprawl first, consult later" exercise we've ever seen. Although comments are due September 2, 2009 on this *Growth Strategy*, in early August the OMB approved a nearly 750 hectare employment area in Simcoe County, just north of the Greenbelt, in the Bradford West Gwillimbury (BWG) Highway 400 Corridor. The OMB hearing was conducted in June 2009 and only *after* the McGuinty government reversed its opposition to the development by suddenly and without notice agreeing in April 2009 to issue three extraordinary "Minister's Zoning Orders" (MZOs) to ensure approval.

The development so clearly contradicts the *Growth Strategy* that the OMB Chair's decision is *conditional* on the delivery of the rare and controversial MZOs. We agree with the Toronto Star's June 12, 2009 editorial "the province could have – and should have – held off on signing any deal regarding development on the [BWG] Highway 400 corridor until the full Simcoe plan had been subjected to public consultation." This employment area, whose fate is decided, is one that we, the public, are supposed to be commenting on for September 2nd!

Despite well deserved cynicism about this process, we do believe this *Growth Strategy* is at least an improvement on Simcoe County's draft Official Plan, in terms of reducing traditional residential sprawl. Nonetheless, it fails to effectively address the growing threat of allowing second homes and resorts to jump established urban settlement boundaries. Against our advice, murky language in the *Growth Strategy* leaves the door open for 2,000 units at the Big Bay Point mega-marina and everywhere else around the Lake.

Perhaps our biggest disappointment is that so much of Simcoe County's new development is proposed for the fragile Lake Simcoe watershed, which, ironically the Province protected through the passage of the *LSPP* (2009), a mere two days before the Protection Plan was dwarfed by the release of the *Growth Strategy* (or Lake Simcoe Paving Vision). In the *Growth Strategy* the Province should have insisted that the Greenbelt be established in Bradford West Gwillimbury, and surrounding other settlements scheduled to grow. The multiplicity of land protection systems in southern Ontario such as "Natural Heritage Systems" and "Greenlands" only complicates things and should be streamlined into a Greenbelt for Simcoe County.

We are deeply concerned that the paving of so much of the watershed will seriously harm the lake, and recommend the Province follow scientific advice to limit impervious surfaces. New development is inevitable, but it needs to as be green and compact as can be. We are disheartened that the Growth Strategy does not provide for a very open and public competition for new greenfields projects in places like Innisfil, Alliston and BWG that would set a new standard for energy and water conservation. Lake Simcoe's special watershed requires new thinking in terms of built form and energy use, which this strategy fails to address. The Province should have followed the City of Toronto's lead by creating a new green building standard, tailored to this watershed's particular needs.

With such a small group of developers standing to gain such an enormous windfall from new sprawl projects in the watershed, it is critical for the health of Lake Simcoe for the members and partners of Campaign Lake Simcoe be given more information about how the McGuinty government arrived at the decision to over-ride Places to Grow. Specifically, we want to know where the staff reports used to develop the Province's strategy are, and why our advice regarding the path to true environmental sustainability in Simcoe County is being ignored.

Campaign Lake Simcoe's Top Recommendations to Improve the Growth Strategy

1. To optimize the use of approved, vacant lands in Simcoe County, as well as to discourage sprawl and leapfrogging of the Greenbelt, we recommend that less population allocation go to Bradford West Gwillimbury and more go to Barrie and Orillia, Penetanguishine, Midland, Collingwood and other northern towns.
2. The *Growth Strategy* needs to cancel, once and for all, the plan to link Highways 400 and 404 north of Bradford.
3. The decision to develop the employment area near Bradford needs to respect *Places to Grow* and stand on its own, without Minister's Zoning Orders. The Simcoe Official Plan must specify that vacant lands already designated for either residential and/or employment development must be utilized before approvals are granted on any greenfields. Wherever new greenfield developments are approved, a municipality must submit a request to grow the Greenbelt in remaining high value ecological and agricultural lands.
4. The Growth Secretariat should delay Official Plan changes so that they reflect Lake Simcoe's revised Assimilative Capacity Study, to be completed this fall, and revised subwatershed plans, which are all based on the *Lake Simcoe Protection Plan's* improved targets for phosphorus loading.
5. Water quality must be protected by emphasizing the environmental targets and indicators from the *Lake Simcoe Protection Plan*, in the guiding principles of the *Simcoe Growth Strategy*, and prioritizing the funding of green infrastructure projects like stormwater management retrofits.
6. Loopholes for resorts and second homes like Big Bay Point need to be closed by recognizing that they are, like other homes, an urban use, and limiting them to settlement areas.
7. Water conservation must be a key element of the *Growth Strategy* and should be a condition of approval for new greenfield developments. We urge the Province to focus its efforts on demand management and on green stormwater infrastructure.

About this paper: Campaign Lake Simcoe's feedback on *Simcoe Area: A Strategic Vision for Growth* (referred to as *Growth Strategy*) focuses on two items:

1. The lack of public consultation regarding provincial support for the Bradford West Gwillimbury employment area and associated planning decisions, and
2. The potential effects of the proposed developments on Simcoe County's water resources.

Our comments reflect our concerns regarding the quality and quantity of the area's subsurface and surface water resources, and the impacts of sprawling development on Lake Simcoe's fragile watershed. The rest of the paper provides more detail on each of our recommendations.

This response to the *Growth Strategy* is informed by several policy-related documents including, but not limited to, the Lake Simcoe Protection Act (2008), the Lake Simcoe Protection Plan (2009), the Simcoe County Official Plan (2007), Places to Grow (2005), and the Provincial Policy Statement (2005). Reference is also made, where applicable, to the Lake Simcoe Region and Nottawasaga Valley Conservation Authorities watershed report cards. Additionally, we refer to and build on our March 2009 "Plan for Success: A Citizen Response to the Draft Lake Simcoe Protection Plan" document, which was supported by 25 groups and was written with input from a number of local organizations, experts and individuals.

We would like to acknowledge the following people for their contributions to this paper:

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Claire Malcolmson, Campaign Lake Simcoe Project Coordinator
David Donnelly MES LLB, Counsel to Environmental Defence
Amber Cowie, Ontario Nature Greenways Coordinator

About Campaign Lake Simcoe: Campaign Lake Simcoe is a partnership of Environmental Defence, the Rescue Lake Simcoe Coalition and Ontario Nature and welcomes participation from all citizen groups who care about Lake Simcoe. Citizens have been leading the charge for the Lake Simcoe Protection Act since 2006. With both the Act and Plan now in force, we continue to monitor developments, policies, plans and decisions that may have implications for the overall ecological integrity of Lake Simcoe and its watershed.

This document is endorsed by the following organizations:

Environmental Defence, Ontario Nature, Rescue Lake Simcoe Coalition, Bond Head BWG Residents for Responsible Development, Kids for Turtles Environmental Education, Mountain Equipment Co-op-Toronto store, Snake Island Cottagers Association, Innisfil District Association, Great Lakes United, Ecojustice (also submitting a separate response), Georgian Bay Forever, York Simcoe Naturalists, Carden Field Naturalists, West Humber Naturalist Club, Eight Mile Point Cottagers' Association, Crescent Harbour Association

GROWTH STRATEGY: OUR FEEDBACK

KEY RECOMMENDATION #1:

To optimize the use of approved, vacant lands in Simcoe County, and to discourage sprawl from leapfrogging the Greenbelt, we recommend that less population allocation go to Bradford West Gwillimbury and more go to Barrie and Orillia, Penetanguishine, Midland, Collingwood and other northern towns.

The choice of five urban nodes makes better use of infrastructure, and has the potential to have a lower overall environmental impact than Simcoe County's 2008 Official Plan, which added sprawling, low-density development in every municipality in Simcoe County. Indeed, streamlining planning activities in the County might reduce the instances of ill-equipped municipal planning departments making recommendations to Councils that impede the area's long-term sustainability and prosperity. The *Growth Strategy* provides an opportunity to enforce the sensible provincial intensification targets and minimum densities for greenfield development, as laid out in the Growth Plan and the *Provincial Policy Statement* (PPS) (2005). But the *Growth Strategy* caves in, and disregards the PPS and Places to Grow, by neatly leapfrogging the Greenbelt and putting a large amount of growth around Bradford West Gwillimbury (BWG). Explosive new development near BWG is located right in the centre of prime Greenbelt expansion territory and threatens the political future and ecological integrity of the Greenbelt. Finally, this decision promotes leapfrog development along an already dangerously congested Highway 400.

From the *Growth Strategy* (2009) and the *Intergovernmental Action Plan* (IGAP) *Growth Potential Report* (2006), we understand the County of Simcoe has more than enough land within approved settlement areas to accommodate the next 20 years of growth. Furthermore, if there are thousands of acres of approved and serviced Employment Lands in the Greater Toronto Area, why the rush to expand onto prime agricultural land in BWG? Though claims within the *Growth Strategy* and from land developers state that these lands are not situated where future demand will be highest, Places to Grow and other provincial land use plans prioritize infilling over the development of new lands and should be adhered to, for both legal and environmental reasons.

We wonder what led to the Province's current proposal for population allocation. While there are some sensible directions, such as growing around the successful auto manufacturing plants in Alliston to make it a complete community, we are concerned about the Province's justification that they relied on the Intergovernmental Action Plan (IGAP). Of the many options considered in IGAP's 2006 Growth Potentials Assessment Report, option 3 has the lowest Phosphorus loadings of the multi-nodal options. The Lake Simcoe Region Conservation Authority (LSRCA) pointed out the certain damage to Lake Simcoe of the other options in meetings at the time, but option 3 was not chosen by the Province. In light of the Province's excellent new *Lake Simcoe Protection Act*, this does not make sense.

Simcoe County is a growing region of the Province. The total population in Simcoe County has nearly doubled, from approximately 240,000 in 1981 to almost 440,000 in 2006. But the growth allocation of 667,000 people and 254,000 jobs by 2031 (MEI, 2009) is something that we question. The allocations are based on the Ministry of Finance's presumption of the continuation of current rates of economic growth and immigration in Ontario, which are projections—not guarantees. In an increasingly post-industrial country, building industrial and manufacturing spaces, and using these employment lands as the justification for approving residential development, is delusional and antiquated thinking. Have the authors been to Barrie lately? Manufacturing and industry are in dire straits. Plunking a massive new industrial area away from public transit is just plain wrong.

The advantages of directing growth at the northern areas are that people living that far from Toronto are unlikely to be commuters. There is great potential in the northern areas for cottage industries and home offices, which reduces strain on infrastructure, and are more environmentally sustainable. In fact, the communities wanting growth should compete for growth allocations, with the growth going to the communities with the greenest building standards using certification programs like LEED designs, Forest Stewardship Council lumber and Green Gravel.

Further Recommendations:

- In order to allow for adequate environmental assessment of the *Growth Strategy*, MEI must detail how many acres of greenfield could be developed under this plan.
- Infilling and redevelopment of spaces within the City of Barrie is another alternative to boundary expansion and should be considered ahead of boundary expansion.

KEY RECOMMENDATION #2:

The *Growth Strategy* needs to cancel, once and for all, the plan to link Highways 400 and 404 north of Bradford.

Buried in the secretly negotiated Official Plan Amendments (OPA) 15 and 16 Minutes of Settlement between the town of Bradford West Gwillimbury, Simcoe County, the Bond Head Development Corporation, and others, is a signal to developers that developing the 400 – 404 (known as the Bradford By-Pass) highways link may be going forward. This came as a surprise to environmentalists. In a letter to the Environmental Priorities Coalition, Sept. 25, 2007, the Province writes:

In the Growth Plan for the GTA that the Ontario Liberal government finalized in our first term, we ensured that the previous Conservative government's plans to extend Highway 427 to Barrie and Collingwood, and extend Highway 404 deep into Victoria-Halliburton and the Bradford By-Pass were not part of our 25-year infrastructure plan. In our next mandate, we will continue

with implementing the Growth Plan and ensure that the infrastructure planning focus is on what is in our balanced 25-year plan. <<http://www.glcommunications.ca/platforms/liberals.html>>

Yet the Minutes of Settlement read:

"Representation and Acknowledgments of parties:"

c) Because the settlement contained in these Minutes will add additional employment land to BWG's existing supply of employment lands, BWG is prepared to initiate an official plan amendment that recognizes that a portion of the lands in BWG that are currently designated for employment purposes will only develop in the event that construction has commenced on the Highway 400 - 404 link." (p.4)

The shelving of plans for a Bradford Bypass was the original justification for developing employment lands on the 400. The concern is that when the bypass is built, Bradford will have two new large industrial employment areas. There are thousands of acres of developable land in the so-called White Belt, between Toronto and the Greenbelt. So we wonder why there is a sweetheart deal here for developers, when it both reverses a Liberal promise (above) and opens up more greenfields for development?

For a discussion of the potential future consequences of OPA 15 and 16 and the Bradford Bypass, see Appendix 1.

KEY RECOMMENDATION #3:

- 1. The decision to develop the employment area near Bradford West Gwillimbury needs to respect *Places to Grow* and stand on its own, without Minister's Zoning Orders. The Simcoe Official Plan must specify that vacant lands already designated for either residential and/or employment development must be utilized before approvals are granted on any greenfields. Wherever new greenfield developments are approved, a municipality must submit a request to grow the Greenbelt in remaining high value ecological and agricultural lands.**

As part of its greater strategy to establish high quality jobs in the Simcoe area and to further strengthen the regional economic base, the Province has identified two employment nodes along Highway 400 south of Barrie in Innisfil and Bradford West Gwillimbury. We question the need and motivation for this decision because, according to the *Growth Potential Assessment Report* (2006, p. 143 (E-3)), "based on data provided by individual municipalities, the supply of vacant employment lands in the study area is around 3,800 hectares." According to the *Growth Strategy*, these Highway 400 lands would be particularly suited to house clusters for manufacturing and industrial operations, as they require large lots and goods movement access that is provided by the highway. We question whether it makes sense

at ALL for the provincial government to zone new manufacturing areas, by Minister's Zoning Orders, when the manufacturing sector has shrunk by 26% since 2002.

The criteria used to determine location (MEI, 2008) are primarily economic ones, which inadequately take into consideration environmental impacts that may stem from the establishment of these industrial employment areas. For example, there are obvious air pollution impacts of private vehicle transportation and trucking, which will result from the expanded "capacity" of Highway 400. Secondly the provincially appointed Lake Simcoe Scientific Advisory Committee (SciAC) wrote that, "In general, aquatic biological systems begin to degrade at impervious [hardened or paved] levels of 10-15%," (SciAC, 2008, p. 67). Therefore, new development that pushes the impervious portion of a subwatershed past the ecological threshold must be carefully scrutinized. After all, the Province enacted the *LSPP* (2009) just two days before the *Growth Strategy* was released, so we also assume the Province wants to save Lake Simcoe. Further impacts on water are detailed under recommendations 4 and 5.

The selection of these employment areas, we argue, begins to erode both *Places to Grow* (2005) and the *Growth Plan for the Greater Golden Horseshoe* (2006). Nowhere is this more clearly demonstrated than in the August 7th OMB decision regarding OPA 15 and 16 in Bradford West Gwillimbury (BWG).

We are pleased with the last paragraph of sub-section 4.1 "Simcoe Area Land Budget" which notes that while realigning and phasing land supply, before new greenfields can be developed, municipalities must first promote infill and redevelopment and prioritize intensification and development to areas where access to employment, commercial services and public facilities already exist (MEI, 2009, p.28). We could not agree more. Unfortunately, the Province's commitment to this concept is betrayed with the OMB's approval of OPA 15 and 16 in BWG on Highway 400.

The Toronto Star reported on March 14, 2009, that the province negotiated the BWG "settlement" with Toromont Industries, and "their municipal supporters" to allow Toromont to re-locate its manufacturing plant, threatened by the planned University/Spadina subway expansion, to the Hwy 400 corridor. It was first reported the company would move its operations and 2,500 jobs to Manitoba if it couldn't relocate in Ontario. In a letter to the editor by Toromont Vice-President David Wetherald, the company stated emphatically that it did not threaten to leave Ontario and will only re-locate 500 jobs, few if any in "manufacturing". See the Letter from Toromont's Vice-President David Wetherald to the Toronto Star at: <<http://www.thestar.com/News/TorontoGTA/article/602341>>

The deal, which was never shown to the public prior to signing, reads at Recital N: "To assist with the relocation of Toromont and to ensure jobs remain in Ontario, the County and BWG requested that the Minister enter into discussions with the Parties through the Office of the Provincial Development Facilitator ("OPDF")" [our emphasis]. And yet, the McGuinty government signed the Minutes of Settlement for this development in April, 2009.

There are thousands of acres of serviced, zoned industrial land throughout the Greater Toronto Area that were overlooked by the province when choosing to re-locate Toromont to Bradford's agricultural land at the Hwy. 400 / 88 area. Thus it appears that Toromont's non-existent 'threat' was used to justify

the employment lands, which, because they do not conform to the Growth Plan, required Minister's Zoning Orders to be issued by the province. One would have to be naïve not to wonder who wins. Not the Province's credibility. Not farmers, the environment or commuters. Not downtown Bradford. Not even those developers and municipalities who have played by the rules of *Places to Grow*. Even some of them are mad about this!

In the "Preserving Rural Assets and Reducing Sprawl" section of the *Growth Strategy*, we are reassured that provincial policy limits growth and development in rural, unserved or partially served communities and re-directs them to settlement areas with full municipal water and wastewater systems. Accordingly, the *Growth Plan* (2006) encourages municipalities to "designate and preserve lands ... in the vicinity of major highway interchanges, rail yards and airports, as areas for manufacturing, warehousing, and associated uses" (MEI, 2009, p. 18). Yet perversely, along Highway 400 where the employment nodes are proposed, there are no services, there is no public transportation, and there is pressure on rural and agricultural lands. Putting the BWG employment lands 6 km from the settlement area could not be further from satisfying the Growth Plan's Guiding Principles to "revitalize downtowns to become vibrant and convenient centres.... create complete communities.... and curb sprawl and protect farm land and green spaces" (Ministry of Public Infrastructure and Renewal (MPIR), 2006, p. 10). The same sorts of mis-matches regarding the OMB approvals of BWG OPA 15 and 16 and Provincial planning documents, occur on pages 17 – 18 of the *Growth Strategy*, where "advantages" of focusing job growth in the primary urban nodes are listed.

The third bullet point in "Guiding Principles" on seizing opportunities "... to identify and support strategic employment areas for future high quality manufacturing and industrial jobs" (MEI, 2009, p. 8) needs to be clear and unequivocal by stating that the identification of employment areas will be first done within existing settlement areas. That is, vacant lands already designated for development within settlement areas must be developed first as a means of reducing the development of new greenfield sites, and indeed simply to comply with the Province's own direction in the Provincial Policy Statement.

Needless to say, we find it odd for the *Growth Strategy* to be simultaneously advocating for the protection of agricultural lands while supporting the development of these industrial and manufacturing employment nodes in some prime agricultural lands. Given all the mis-fits with Provincial plans, the OMB's reliance on Minister's Zoning Orders and an amendment to *Places to Grow* (2005) to justify approval of BWG's employment area, we are suspicious of the Province's motives for promoting industrial sprawl and constructing costly new infrastructure for the two new employment nodes. We need evidence that this plan (i.e. to build employment lands along Highway 400) works at all before we rezone more greenfields as employment areas.

Where is the Province's plan to grow viable agriculture and biological communities? Simcoe's Official Plan must establish a regional-scale Natural Heritage System, or better yet, add land outside of settlement areas to the Greenbelt. We suggest that for every new acre of greenfield land re-zoned employment or residential, five acres of permanent new greenbelt should be created in the vicinity. If

we are not careful, we will leave too little agricultural land for any food security, and too little greenspace for healthy biodiversity.

Further Recommendations:

- Make public the planning report and the economic justification for new manufacturing areas in Southern Ontario, and the Highway 400 employment areas in Simcoe County.
- The "Guiding Principles" point on seizing opportunities "to identify and support strategic employment areas for future high quality manufacturing and industrial jobs" needs to state that the identification of employment areas will be first done within existing settlement areas.
- Re-evaluate the need for the development of the employment nodes, as this may influence the decision to not expand the capacity of Highway 400. Instead, re-direct resources to creating public transit in complete communities that are promote walking, cycling and transit use. Ensure that residential densities support public transit.
- Barrie should get a greater share of the employment allocation than is currently proposed.

KEY RECOMMENDATION #4:

The Growth Secretariat should delay Official Plan changes so that they reflect Lake Simcoe's revised Assimilative Capacity Study, to be completed this fall, and revised subwatershed plans, which are all based on the *Lake Simcoe Protection Plan's* improved targets for phosphorus loading.

The good news is that new development must conform to regulations in the *LSPP* (2009), which should mitigate some of the environmental impacts of the massive new areas of development in the Lake Simcoe watershed. But there are inconsistencies between the plan for growth in Simcoe County and the objectives of the *LSPP* (2009); five of the seven areas proposed for settlement area expansions or employment areas are in the fragile Lake Simcoe watershed, and if they proceed they will harm the lake.

We agree that, in principle, focusing anticipated growth into the five urban nodes will put less pressure on agricultural and natural lands on the watersheds. But paving the following areas (Barrie, Orillia, Bradford, Innisfil Heights Employment Area, and BWG Employment Area) for growth in the Lake Simcoe watershed, flies in the face of the Lake Simcoe Science Advisory Committee SciAC's recommendations regarding impervious surface thresholds, referred to under Recommendation 3 above. The biggest failure of the *LSPP* (2009) is that there is no explicit limit on impervious surfaces, and the *Growth Strategy* does not address this failure.

LSPP (2009) states, " Within five years of the date the Plan comes into effect, the LSRCA in partnership with municipalities and in collaboration with the MoE, MNR, and MAFRA will develop and complete subwatershed evaluations for priority subwatersheds," (Policy 8.3). We therefore suggest that the subwatersheds discussed below are prioritized, and are *completed before Official Plan amendments are made*. The provincially appointed Stakeholder Advisory Committee was assured that the subwatershed plans would inform planning decisions. If they do not inform planning decisions, they will become redundant.

An explanation of the possible environmental impacts on three main development areas, we think, helps make the case for our recommendation. We discuss in Appendix 2 the impacts of Barrie-Innisfil boundary change, and the Innisfil and Bradford West Gwillimbury employment nodes. In Appendix 3, we discuss in greater detail the impacts of the employment nodes on phosphorus loadings and aquatic health at the subwatershed level.

KEY RECOMMENDATION #5:

Protect water quality by emphasizing the environmental targets and indicators from the *Lake Simcoe Protection Plan*, in the guiding principles of the *Simcoe Growth Strategy*, and prioritize the funding of green infrastructure projects like stormwater management retrofits.

For the most part, the five guiding principles of the *Growth Strategy* strongly emphasize the protection of the natural environment of the Simcoe area. We were pleased to see a commitment, in principle, to managing growth within the three watersheds in Simcoe County: Lake Simcoe, Nottawasaga and Severn. Of course, these lofty goals are not achieved without effort and the coordination of policies. We are concerned, again, that if Official Plans are amended, and the Employment Zones are approved before municipalities make specific plans to meet the targets in the *LSPP*, then the lake will suffer. The *Growth Strategy's* Guiding Principles need to refer to targets such as the following from the *LSPP*:

Selected targets on page 42 include, "Achieve a minimum 40% high quality natural vegetative cover in the watershed", "Achieve increased ecological health based on the status of indicator species and the maintenance of natural biodiversity," and "Reduce contaminants to levels that achieve provincial Water Quality Objectives or better." Finally, Policy 4.5 (Strategic Action) should be in the Guiding Principles " Within five years of the date the Plan comes into effect, municipalities, in collaboration with the LSRCA *prepare and implement* comprehensive stormwater management master plans for each settlement area in... the watershed."

The principle to protect the watersheds mentions that this will be done through "strategic investment in innovative green infrastructure and new technology" (MEI, 2009, p. 7). The implied message is clear: where technological solutions to continued environmental degradation exist, a project or plan can be justified. A genuinely sustainable approach would be either to ask if the proposed developments that

require more land are needed in the first place, or to protect the natural features that keep bodies of water clean, in a long-term, economically sustainable way (Wilson, 2008).

That said, “strategic investment in innovative green infrastructure and new technology” is important. Given that any new development in the Barrie-Innisfil annexation lands will negatively impact Lake Simcoe's health, we appreciate the *Growth Strategy* designating Barrie as the "priority area for investment in major regional infrastructure" (p. 12) and hope this extends to stormwater and sewage infrastructure and retrofits.

We remind the government of its obligations to the designated policies of the *LSPP* (2009) on managing stormwater. Specifically, policy 4.7 requires municipalities to incorporate into their official plans policies to reduce stormwater runoff volume and pollutant loadings from major development and existing settlement areas (*LSPP*, 2009). Designated policy 4.8 requires major development applications (including the proposed employment nodes) to be accompanied by a stormwater management plan (*LSPP*, 2009).

It is unclear to what extent, if at all, the Province will support the municipalities in achieving wastewater servicing and managing stormwater. If provincial investments are to be channeled to already serviced settlement areas, then what is left for smaller, rural settlement areas? If financial support will be provided by the Province, that should be stated here. Another worrying phrase appears in the last paragraph on page 25 reads: “In planning for population and employment growth in Lake Simcoe, existing and planned servicing capacity of settlement areas, cost-effective servicing options, and environmental impacts ... will be recognized and taken into consideration” (MEI, 2009, p. 25). We fear “cost-effective” can sometimes mean doing nothing or very little to protect Lake Simcoe and its water resources. In our view, choosing not to protect the lake’s watershed against growth and development because it costs more is not a valid option. MEI's Strategy could do much more to recognize the notion that ecological health and economic stability go hand in hand.

Conservation authorities' studies indicate that the levels of a number of contaminants are elevated and/or worsening in Lake Simcoe, including phosphorus, chloride, and chromium. Each of these contaminants is projected to increase if the proposed employment lands are built. See Appendix 4 for more information and research.

Finally, with regard to potential risks to groundwater quality, sources of contamination include gas stations, dry cleaning plants, landfills, and industrial manufacturing plants, as well as larger scale sources such as the agricultural use of nutrients and pesticides, the disposal by spreading of sewage and non-sewage biosolids and the application of de-icing salt to area roads and highways. We are naturally concerned over the effect of the effluents and discharges of the proposed employment nodes on the quality of the water resources. Including the above mentioned targets and indicators from the *LSPP* right in the guiding principles of the *Growth Strategy* would help bring these issues to the forefront where they need to be.

Further Recommendations:

- In planning for the future uses of the newly acquired lands, the City of Barrie must be mindful of the natural heritage target of the LSPP (2009), which aims to achieve a minimum of 40 percent high quality natural vegetative cover in the watershed.
- Specify the commitment of the provincial government to support wastewater servicing in smaller, rural municipalities in order for them to achieve the phosphorus reduction targets.
- Remove or re-phrase the last paragraph on page 25 of the *Growth Strategy* such that cost-effectiveness is not seen to trump environmental impacts as a consideration when planning population and employment growth in Simcoe County.
- Because studies indicate that heavy metal, chloride and phosphorus (and possibly other contaminant) levels are increasing, the *Growth Strategy* needs to thoroughly re-evaluate the establishment of large-lot employment nodes in the watershed and the types of industries to be placed there.
- Address phosphorus at its source rather than dealing with it as an end-of-pipe problem, e.g. through stormwater management plans with a greater emphasis on lot-level control, the protection of natural forest cover, and especially wetlands.

KEY RECOMMENDATION #6:

Loopholes for resorts and second homes like the Big Bay Point mega-marina need to be closed by recognizing that they are, like other homes, an urban use, and restricting them to settlement areas.

There are more than 12,000 cottages on Lake Simcoe alone, and, while residents are well-intentioned, cottages' impact on water quality is significant. The *Growth Strategy* acknowledges that second homes are on the rise, and large numbers of seasonal cottages are being converted into permanent dwellings. Frankly, because so little natural shoreline remains, few new cottages are possible as almost all waterfront lots on Lake Simcoe are developed. But if we are to protect "the Simcoe area's valuable rural assets", our treatment of resorts and second homes needs to be clear.

There is no definition of a so-called time share or limited occupancy "second home" in Ontario planning laws. A seasonal or second home is an urban use, in that these residences pave land, produce waste, consume energy and water, produce waste water and need services like hospitals, police, fire,

ambulances, etc. To reflect this, on page 23 of the *Growth Strategy*, the wording should be changed to: "Such development should [remove "generally"] be limited to areas where full municipal or communal services are available..."

We are pleased to see an acknowledgement of resource-based recreational industries (e.g. ski hills, marinas, etc.) and the challenges stemming from their development and activities. Specifically, we are encouraged by the statement: "development associated with these activities must be carefully managed to ensure that it does not threaten or overwhelm the very resources on which these industries depend" (MEI, 2009, p. 22). We applaud the specific strategic direction which calls for strong protection measures for the resources on which tourism and recreation depends. However, the intention rings hollow, as the same Plan will undoubtedly harm Lake Simcoe's water quality through a large increase in impervious surfaces. It would be helpful if the recreational resources alluded to were spelled out, such as Lake Simcoe and other natural heritage features that are the region's main natural attractions.

We support the call for development associated with recreational-based activities to be directed to settlement areas, as mentioned above. Adding "resorts" like Big Bay Point, with 1,000 marina slips, 30-acre hole in the shoreline, 1,600 residential units, 400-room hotel, championship golf course, theatre, shopping, recreation centre, etc. should not be considered outside urban growth targets. To this end, the Big Bay Point Resort must not be transitioned (allowed) under the *Lake Simcoe Protection Plan* (2009). We challenge the on-going environmental assessment of the water servicing for Big Bay Point, partially because it contradicts the intention of this section of the *Growth Strategy* and is being conducted under the cloud of tens of millions of dollars in outstanding lawsuits against our members of the Innisfil District Association. The McGuinty government has failed the public by permitting this assessment to continue under these circumstances.

Further recommendations:

- Specify the natural resources (e.g. Lake Simcoe) on which resource-based recreational industries depend for an even stronger acknowledgement of their need for protection.
- We support the call for development associated with recreational-based activities to be directed to settlement areas, but the policy needs to be airtight. New resorts and outstanding environmental approvals, including Big Bay Point, should be required to be consistent with the *Lake Simcoe Protection Plan*.

KEY RECOMMENDATION #7:

Water conservation must be a key element of the *Growth Strategy* and should be a condition of approval for new greenfield developments. We urge the Province to focus its efforts on demand management and on green stormwater infrastructure.

The Simcoe plan presents a great opportunity for the Province to get things right by integrating its laudable move towards green energy and green infrastructure with its recent progressive efforts on water policy and management. Progressive water initiatives such as source water protection and Great Lakes conservation and protection were nascent at the time of *Places to Grow* but now indicate a strong vision for water management in the Province.

The identification of the importance of green infrastructure is commendable. However, one of the most important forms of 'greening' infrastructure - water conservation and efficiency - is missing. Water demand management should be the first in the hierarchy of options for meeting the water supply needs of new growth areas. The preference given to supply-side approaches for water supply and servicing in the *Growth Strategy* contrasts with the emphasis placed on demand management in the transportation section.

Increasingly, experts are recognizing the connection between water supply decisions and energy use, with a number of Canadian cities now actively looking at water conservation and efficiency as a means to reduce energy consumption and decrease greenhouse gas emissions. The *Growth Strategy* should recognize this critical nexus and highlight the co-benefits of water demand management. This important connection was made in the *Green Energy Act* and it should be extended to provincial and regional growth planning. The City of Toronto, with a seemingly endless water supply, adopted the Green Building Standard as a progressive measure to save water, energy and the environment. The failure to recognize the importance of water conservation and efficiency in the *Growth Strategy* undermines the Province's efforts to reduce energy consumption since pumping, piping and treatment of water and wastewater consumes large amounts of energy, whereas conservation and efficiency saves energy.

The *LSPP* (2009) recognizes that water quantity is a pressing issue. Specifically, the *LSPP* mentions that large extractions of groundwater and surface water may be contributing to diminishing water supplies in the watershed, reducing base flow in streams and consequentially water flows into Lake Simcoe. These effects will be exacerbated by climate change, which is likely to contribute to the diminishing water supplies through changes in ice cover and drought events (*LSPP*, 2009). As such, we must use climate change mitigation and the precautionary principle as guiding principles for water quantity policies.

We want to particularly highlight the state of groundwater, which is a key source of the region's water. While groundwater extraction rates are bound to increase as the population grows (the Province's population forecast for Simcoe County adds 52% more people in 22 years, up to 667,000 by 2031), the *Growth Strategy* must recognize that an adequate portion of the available groundwater must be reserved to protect aquatic ecosystems in the watershed (*LSPP*, 2009). This imperative is a key reason for including water conservation in the *Growth Strategy*.

According to the *SSGP* (2003), the capacity of local aquifers to continue to meet current and future demands is not well understood. This is of particular concern for long term planning, specifically the potential for expansion of existing municipal supplies to accommodate future growth, the management

of potable water quality and the maintenance of stream flows via groundwater discharge, particularly in areas where the aquatic ecosystem is sensitive and/or of high quality. Given this uncertainty, Campaign Lake Simcoe once again questions the strategy's push to establish the employment zones, which would presumably rely upon the groundwater resources of the County.

Moreover, in their 2007 watershed environmental monitoring report, the LSRCA noted that water levels in shallow to intermediate wells throughout the majority of the watershed recorded some of the lowest water levels on record (LSRCA, 2008). While 2007 was admittedly a dry year, this nevertheless demonstrates the vulnerability of the groundwater supply for the County, which the *Growth Strategy* needs to reflect.

The potential of this plan to undermine the Premier's commitment to implement the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement is great. In particular, the emphasis on supply-side approaches to water servicing such as optimizing pipelines suggests a different philosophy to the efforts underway to develop a provincial water conservation and efficiency plan and to prohibit intra-basin transfers with strict exceptions.

Overall, the emphasis on green technology reads as if this technology will somehow negate the continued growth and consumption of the County's water resources. This is certainly not the case.

Further recommendations:

- The *Growth Strategy* must use climate change mitigation and the precautionary principle as guiding principles for water quantity policies.

Next Steps

In terms of moving forward, the Province is proposing a number of next steps. We are encouraged by the stated commitment to implementing the LSPP (2009). However, we are concerned about the apparent rush to propose specific amendments to the *Growth Plan* (2006) that identify strategic employment areas and provides a policy framework for their development. Prior to this, we believe the Province needs to carefully re-examine its proposal for the creation of the two employment nodes, especially in light of its potential effects on the water resources and the fact that there are vacant lands already within existing settlements to which these employment areas may be directed. We certainly encourage the Province to do so.

REFERENCES

Campaign Lake Simcoe. (2009). Plan for Success: A Citizen Response to the Lake Simcoe Protection Plan.

County of Simcoe. (2006). Evaluated Natural Heritage Features Map. Available:
http://www.simcoe.ca/ws_cos/media/media/Resource_Report_Figure_4_6.pdf.

Dillon Consulting. (2006). Intergovernmental Action Plan: IGAP: Growth Potentials Assessment Report.

Lake Simcoe Region Conservation Authority. (2008). Lake Simcoe Watershed 2007 Environmental Reporting.

Lake Simcoe Region Conservation Authority. (2008). Watershed Report Card.

Lake Simcoe Region Conservation Authority. (2009) Bill 196: Proposed Barrie Innisfil Boundary Adjustment Act, report to the Board of Directors.

Lake Simcoe Science Advisory Committee. (October 27, 2008) Lake Simcoe and its Watershed: Report to the Minister of the Environment.

Ministry of Energy and Infrastructure. (2009). *Simcoe Area: A Strategic Vision for Growth*.

Ministry of Environment. (2009). *Lake Simcoe Protection Plan*.

Ministry of Public Infrastructure Renewal. (2005). *Places to Grow Act*.

Ministry of Public Infrastructure Renewal. (2006). *Growth Plan for the Greater Golden Horseshoe*.

Minutes of Settlement.

Nottawasaga Valley Conservation Authority. (2008). Middle Nottawasaga River 2007 Subwatershed Report Card.

Ontario Municipal Board. (August 7, 2009). Decision on case no PL071221, BWG OPA 15.

South Simcoe Groundwater Partnership. (2003). South Simcoe Groundwater Study: Draft Report.

Toronto Star. (June 12, 2009). Why the rush in Simcoe?

Wilson, Sara (2008). Lake Simcoe Basin's Natural Capital: The Value of the Watershed's Ecosystem Services. David Suzuki Foundation, Greenbelt Foundation, LSRCA.

Appendix 1 Campaign Lake Simcoe's "Vision" of BGW 2050

The future could look terribly bleak in Bradford. This is what we think could happen as a result of decisions to approve OPA 15 and 16, and the Bradford Bypass:

Services to the Bradford employment lands are subsidized by the town and province, but not enough tenants come, so the taxpayers are on the hook for the rest of these largely useless services. This justifies the expansion of the Bond Head settlement area, (which currently has no official support from the Town of BWG. But significantly, one of Simcoe's biggest developers' website says that "Our Bradford-Bond Head development will by 2031 provide a unique live-work community for up to 70 000 additional people.") The services are already half way there, a deal for developers. We would clearly need to increase the "capacity" of the already choked Highway #400 to accommodate these car dependent suburban residents, resulting in more smog days.

As a result of the promise in the Minutes of Settlement, the Bradford Bypass corridor could also be developed as employment lands, again on greenfields. The extension of unnecessary services and the approvals of employment lands outside settlement areas have stripped *Places to Grow* of meaning and credibility.

Let's imagine that hundreds more acres of prime agricultural land on the Greenbelt's doorstep are paved by these new settlements moves. We would have less local food and be more reliant on imports at a time when imports are riskier, financially and environmentally. The Holland Marsh, Ontario's "Salad Bowl" could be affected by industrial runoff from OPA 15. (The ecological effects on water are detailed in section 4, only they would be amplified by further increases in impervious surfaces, and they would also extend to the Nottawasaga River.)

Is this the Province's desired "Vision"? If not, whose is it?

To read more of Environmental Defence's analysis and commentary on OPA 15 and 16 go to:

<http://environmentaldefence.ca/campaignLakeSimcoe/press/releases.php>

Appendix 2 Impacts of the Barrie-Innisfil boundary change and of employment nodes

Impacts of the Barrie-Innisfil boundary change

The designation of the City of Barrie as the anchor node for the Simcoe area poses some problems. The proposed Barrie boundary expansion into designated greenlands and rural lands in Innisfil blatantly contradicts the following the *Growth Strategy* "Direction for Growth": "Reduce development pressures on rural and agricultural lands, thereby protecting valuable natural heritage, farmland, sensitive watersheds and Lake Simcoe,"(p.10). We are troubled by the irony of this fact. The very phenomenon the Places to Grow Act (2005) and the *Growth Strategy* is trying to avoid (i.e. urban sprawl) is being proposed through this annexation.

We provide our conditional support for the boundary expansion. We are always disheartened to see farmlands become absorbed for urban development purposes. However, in this case, it may be justified since the higher population allocation to this city is consistent with directing growth to existing settlement areas. Unlike Innisfil, which has underperformed in its management of stormwater and sewer infrastructure during a period of unprecedented growth, the City of Barrie has made significant investments in stormwater management resulting in some improvements to the health of Kempenfelt Bay despite the city's growth.

Development will, however, stress Lover's Creek and Hewitts Creeks, and Lake Simcoe. Assuming that just 65% of the annexation lands are developed using current practices, the LSRCA predicts the following: impervious surface area increases to 67% and 58% respectively in Lover's and Hewitts Creeks, far above the 10 – 15% recommended by SciAC; a drop in the hardened surface "grade" from C to E in Lover's, and a B to E in Hewitts Creeks in the LSRCA's Watershed Report Card; and both rivers increased phosphorus loading the Lake Simcoe. (LSRCA, 2009, p.7) If this occurs, this is clearly unacceptable, and guts the Lake Simcoe Protection Act.

Optimistically, this is an opportunity for the MoE and MEI to work together, bringing out the best in each Ministry's policies. The Barrie – Innisfil boundary change is a test of the Lake Simcoe Protection Act, and environmentalists will be watching carefully.

Impacts of employment nodes

Water needed to service the proposed employment lands will presumably come from Lake Simcoe, potentially resulting in an inter-basin transfer, which we do not support. Further, we are concerned that paving and developing for industrial uses along Highway 400 will compromise the function of the groundwater recharge in those areas. According to the County of Simcoe Natural Heritage Features map, the Innisfil Heights proposed employment node site is a hydrological environmental sensitive area (County of Simcoe, 2006). However, to get a better understanding of the water resources in the watershed, we outline in Appendix 3 findings from the reports on the conditions of the subwatersheds

on which these two employment nodes would be situated. A subwatershed approach is a guiding principle of the LSPP (2009) and therefore merits some attention if coordination of policies is to occur. In short, Conservation Authorities' report cards suggest that a number of indicators of stream health will suffer as a result of development in the proposed employment nodes. According to the Plan (2009): "A subwatershed approach will also help determine and define priority areas within the Lake Simcoe watershed, which may need immediate action. This subwatershed approach will be critical to prioritizing initial actions, developing focused action plans, monitoring and evaluating results to ensure plans are updated to reflect new science, information and experience with implementation" (LSPP, 2009, p. 67). But under the *LSPP*, stormwater management plans (Policy 4.5) and subwatershed evaluations (Policy 8.3) are not due for another five years, and the policies do not have legal effect. If the Province is interested in saving Lake Simcoe, they should wait to also evaluate the subwatershed conditions and the impact of development before moving ahead with the employment areas.

Appendix 3 Subwatershed impacts of employment nodes

The two proposed employment nodes are situated within three subwatersheds of the larger Nottawasaga and the Lake Simcoe watersheds. The Innisfil Heights employment node straddles between the Lover's Creek (Lake Simcoe) and the Middle Nottawasaga River Reach (Nottawasaga) subwatersheds. The BWG employment node at the Highway 400 and Simcoe County Road 88 interchange is situated within the West Holland River subwatershed (Lake Simcoe).

A number of conservation authorities issue watershed-wide report cards as a means of evaluating the ecological health of a watershed system, by subwatershed. Table 1 below is a summary of the grades assigned to the areas affected by the employment nodes. Relevance is explained below.

Table 1. Employment Nodes and Subwatershed Grades

Innisfil Heights Employment Node								
Subwatershed	Streamside Vegetation	Forest Cover	Forest Interior	Phosphorus Concentration	Fish Community	Benthic Invertebrates	Hardened Surfaces	Stormwater
Lover's Creek	B	A	B	B	C	C	C	D
Middle Nottawasaga River¹	C	A	C	C	Not Available	C	Not Available	Not Available
Highway 400 and Simcoe County Road 88 Employment Node								
West Holland River	C	B	C	D	C	B	A	D

Adapted from Lake Simcoe Region Conservation Authority, Watershed Report Card, 2008 and Nottawasaga Valley Conservation Authority, 2007.

Innisfil Heights Employment Node

For the forest cover indicator, the two subwatersheds receive an 'A' meaning that at least 25.6 percent of the area of the subwatershed is under either natural or managed forest cover (LSRCA, 2008). Under

¹ For consistency sake, some of the grades for the Middle Nottawasaga River subwatershed have been adjusted to comply with the grading scheme used by the LSRCA for the Lover's Creek and West Holland River subwatersheds.

Conservation Ontario's guidelines, any subwatershed with at least 25.6 percent forest coverage can "provide healthy habitats and enough trees to provide oxygen, soil retention and elimination of carbon dioxide" (LSRCA, 2008, p. 7). Environment Canada, on the other hand, sets a 30 percent minimum for forest cover that would be beneficial as wildlife habitat (NVCA, 2007). The NVCA (2007) already notes a decreasing five-year trend in forest cover in the Middle Nottawasaga. The favourable grading for forest cover will be compromised by the construction of this employment node in these subwatersheds.

A letter grade other than 'A' indicates that the phosphorus concentrations exceeded the provincial objective of 0.03 mg/L. Both subwatersheds affected by the Innisfil node already exceed the provincial objective for phosphorus.

In terms of hardened surfaces, Lover's Creek only received a fair grade because between 15 and 19.9 percent of its area has impermeable cover (LSRCA, 2008). The higher impermeable surface cover is due to its close proximity to the City of Barrie. We are naturally concerned Lover's Creek subwatershed because it would be impacted by BOTH the City of Barrie's boundary expansion and the Innisfil employment node.

Using the indicators of benthic grade, total phosphorus, total suspended solids and E. coli counts, the Middle Nottawasaga River is performing below or at average when compared to the larger Nottawasaga Valley watershed. The Middle Nottawasaga River received a letter grade of 'C' using benthic invertebrates or insects that inhabit the streambed as indicators of stream health (NVCA, 2007).

Thus, these ecological indicators tell us that both Lover's Creek and the adjacent Middle Nottawasaga River watersheds are not very healthy. Assimilative Capacity Studies and subsequent subwatershed plans are designed to inform development decisions, and rationalize the use of green building techniques; it is premature to make amendments to Official Plans in these greenfield areas before they are complete. Their approval undermines the objective and successfulness of the Lake Simcoe Protection Act and Plan.

Highway 400 and Simcoe County Road 88 Employment Node

The forest cover in the West Holland River subwatershed received a 'B' indicating that between 18.8 and 25.6 percent of its area is under forest cover (LSRCA, 2008). Again, this falls short of both the Conservation Ontario and Environment Canada's guidelines for adequate forest coverage.

The phosphorus concentration was fair for West Holland River. Like Lover's Creek and Middle Nottawasaga, it exceeds the provincial objective of 0.03 mg/L for phosphorus.

With regard to hardened surfaces, the West Holland River received an excellent grading indicating that less than ten percent of its area is either in the form of a parking lot, rooftop, road or compacted soil (LSRCA, 2008). Because of the low grade the West Holland River got for stormwater control, 'D', it is environmentally important that the stormwater management plans are made before this area is developed

Appendix 4 Background re: recommendation #5:

Protect water quality by emphasizing the environmental targets and indicators from the *Lake Simcoe Protection Plan*, in the guiding principles of the *Simcoe Growth Strategy*, and prioritize the funding of green infrastructure projects like stormwater management retrofits.

We are pleased to see the *Growth Strategy* promising to take water quality into account in its planning for population and employment growth in the watersheds of Simcoe County. According to the LSRCA (2008) observations, the vast majority of pollution entering waterways in the Lake Simcoe watershed are non-point source in origin. Because land clearing contributes to non-point source pollution, it is premature to open up thousands of acres of greenfields for new development until those sources have declined to sustainable levels.

Phosphorus is a key concern for the Lake Simcoe watershed. Even in the dry and low flow conditions in 2007, total phosphorus continued to be the most problematic contaminant in rivers of the Lake Simcoe watershed. *The Provincial Water Quality Objective (PWQO) was exceeded in 90% of the samples collected in 2007* (85% of samples from 2002 – 2007) (LSRCA, 2008). With this in mind, we understand the *Growth Strategy* has committed to reduce phosphorus loadings to Lake Simcoe and to rivers within the watershed through requiring comprehensive stormwater management plans and encouraging innovative green measures (MEI, 2009). However, we urge the Ontario Growth Secretariat to follow the Phosphorus Reduction Strategy as outlined in chapter 4 of the LSPP (2009), specifically, policy 4.24d which calls for “the identification of practical and effective actions that should be taken to address each source or sector assessed” (LSPP, 2009, p. 34). We believe addressing phosphorus at its source is a stronger measure than dealing with it as an end-of-pipe problem such as through stormwater management plans.

Chloride concentrations in tributaries and Lake Simcoe are steadily increasing. One of the main sources of chloride is road salt that is applied in the winter months. The LSRCA (2008) believes there to be an increasing trend in its concentration in the watershed. The two stations that do show exceedences of the guideline are also those with the highest proportion of urban area upstream, specifically the Tannery and Holland Landing stations. At these concentrations, chloride can impact the health of fish, aquatic insects, aquatic and terrestrial plants. With the added expansion of Barrie and the establishment of the two employment nodes, the servicing of winter roads becomes a concern.

Chromium is a heavy metal that is also present in the waters of Simcoe County. As noted in the 2006 LSRCA monitoring report, total chromium recorded at Holland Landing is chronically above expected levels for natural waters (LSRCA, 2008). The sources of chromium include cement, chromium steel and metal plating industries, burning of fossil fuels and leather tanneries.

Finally, with regard to potential risks to groundwater quality, sources of contamination include gas stations, dry cleaning plants, landfills, and industrial manufacturing plants, as well as larger scale sources such as the agricultural use of nutrients and pesticides, the disposal by spreading of sewage and non-sewage biosolids and the application of de-icing salt to area roads and highways. We are naturally

concerned over the effect of the effluents and discharges of the proposed employment nodes on the quality of the water resources.