



The Ontario Headwaters Institute

April 30, 2020

Minister Steve Clarke
Ministry of Municipal Affairs and Housing
PDF via e-mail

Dear Minister Clark,

We write to express our deep concerns regarding a request from Simcoe County for a Minister's Zoning Order for the proposed Environmental Resource Recovery Centre. We believe that a ministerial zoning order (MZO) is not warranted and would have several negative consequences. For example:

- An MZO would ignore inaccurate and superficial statements in the County's documents, such as that the proposed site would only impact 5% of the 207 acre forest block. While that may be the site footprint, it does not take in to account the impact of noise, dust, and light pollution on a broader area and its species;
- An MZO would ignore the lack of a consistently available supply of piped water supply, particularly for fire fighting. The shortfall could result in increased threats to personal safety and property damage, while taking water from immediate sources could damage the local environment for at least the short term;
- An MZO would paper over what we see as an error in siting this facility in a headwater area rather than in an industrial area, which might have been access to water and other services and reduce transportation demands. It would, in effect, only reward poor planning on the part of Simcoe County; and,
- An MZO would short-circuit the normal appeal process, at which, as we understand it, the Friends of Simcoe Forests has expended significant time, resources, and money to prepare for a possible LPAT hearing, leaving several legal, planning, and technical issues with the proposed site potentially unresolved or at best imposed without fulsome community engagement.

We urge you to resist issuing an MZO for this proposed plan.

Sincerely,

Andrew McCammon

Executive Director