



LAKE SIMCOE UNDER PRESSURE IN 2021: key stressors and solutions



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Lake Simcoe: A case study of development impacts on water

Lake Simcoe has a rich and varied history of First Nations culture, farming, fishing, forestry, ice harvesting, small towns, downtowns, and now, massive urban sprawl. Lake Simcoe is a microcosm of the forces that weigh on water in Southern Ontario today.

Between now and the summer of 2021 conversations about what (if any) changes will be made to our home-grown watershed protection legislation, the Lake Simcoe Protection Plan, will take place. In the intervening time, we want everyone who loves Lake Simcoe to understand what it's going to take to protect its water quality.

The province is consulting on Greenbelt expansion at this time too, until mid-April, 2021. Unfortunately, the consultation does not mention Greenbelt expansion to Simcoe County. But applying Greenbelt policies to Simcoe County would support the implementation of the Lake Simcoe Protection Plan.

In this report we outline the decisions pending this year that affect Lake Simcoe. And we ask a critical question - does the left hand know what the right hand is doing? Who is looking at the cumulative impact of all of these activities on Lake Simcoe's health?

We ask the province and municipalities, do you love Lake Simcoe enough to:

- Limit growth in the watershed to sustainable levels in order to protect the lake's health (p. 6);
- Stop the Orbit MZO development for up to 150,000 people in farm fields around a proposed GO train station (p. 8);
- Stop the Bradford Bypass over the Keswick/Holland Marsh at the south end of Lake Simcoe, destroying the very wetlands the Lake Simcoe Protection Plan requires protection of (p.10);
- Stop the Upper York Sewage System from discharging into Lake Simcoe (p. 12);
- Keep the Lake Simcoe Protection Plan strong; and
- Grow the Greenbelt into Simcoe County to support Lake Simcoe's health and the perseverance of farming in the area.

To us, water is life. Water is finite and non-renewable, and as such it cannot be taken for granted. Our water requires our constant care and attention.

We hope you will join us in protecting what we value.

Lake Simcoe is at a critical point in its recovery

More than \$80 million dollars from the province of Ontario and the federal government have been spent on Lake Simcoe's rehabilitation since 2008. Those critical investments have helped naturalize some shorelines, restore some wetlands, and reduce phosphorus loads from agriculture, sewage treatment plants, and urban sources.



Phosphorus drives aquatic plant and algae growth in waters that lead to Lake Simcoe. The decomposition of those plants reduces the oxygen in the water available for cold-water fish like Lake Trout and Whitefish.

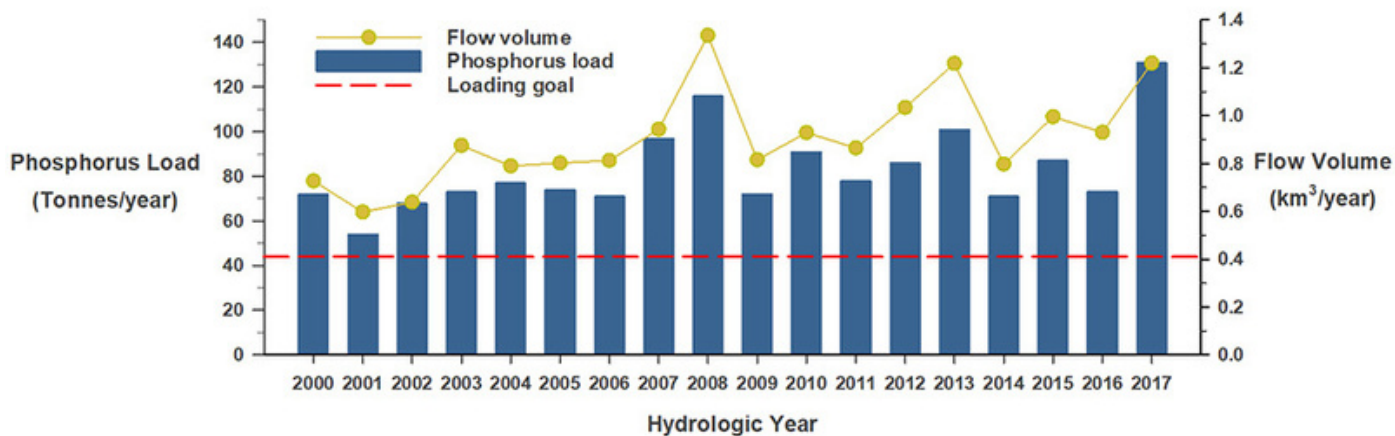
But the minor improvements achieved are overshadowed by two critical threats: climate change and the impacts of development.

Thanks to a changing climate, the Lake Simcoe watershed has seen an increase in major storm events which leads to infrastructure failure and more pollutants, including phosphorus, entering the lake. 100-year storms are now happening roughly every 10 years. [1]

Ontario's *Climate Ready: Adaptation Strategy and Action Plan* tells us we should expect more precipitation events, year-round flood events and increased storm runoff. This means that Lake Simcoe will be experiencing more damage from our urbanization as time goes on - not less.

[1] Government of Ontario. *Climate Ready: Adaptation Strategy and Action Plan 2011-2014*. 2012.
<https://www.ontario.ca/document/climate-ready-adaptation-strategy-and-action-plan-2011-2014-0#section-2>

Chart: Flow volume in rivers leading to Lake Simcoe is increasingly influenced by climate-change-driven heavy precipitation events. And the flow also influences the amount of phosphorus that goes into Lake Simcoe. Managing climate change emissions and impacts are key to the lake's health.



Source: Minister's 10-year report on Lake Simcoe, July 2020.
ontario.ca/page/ministers-10-year-report-lake-simcoe#section-3

To protect Lake Simcoe's health, and the \$420 million sustainable tourism sector driven by fishing, the Lake Simcoe Protection Plan was developed and became law in 2009.

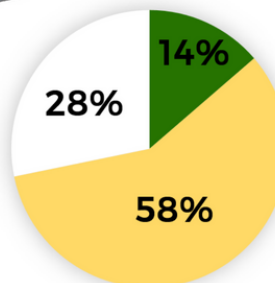
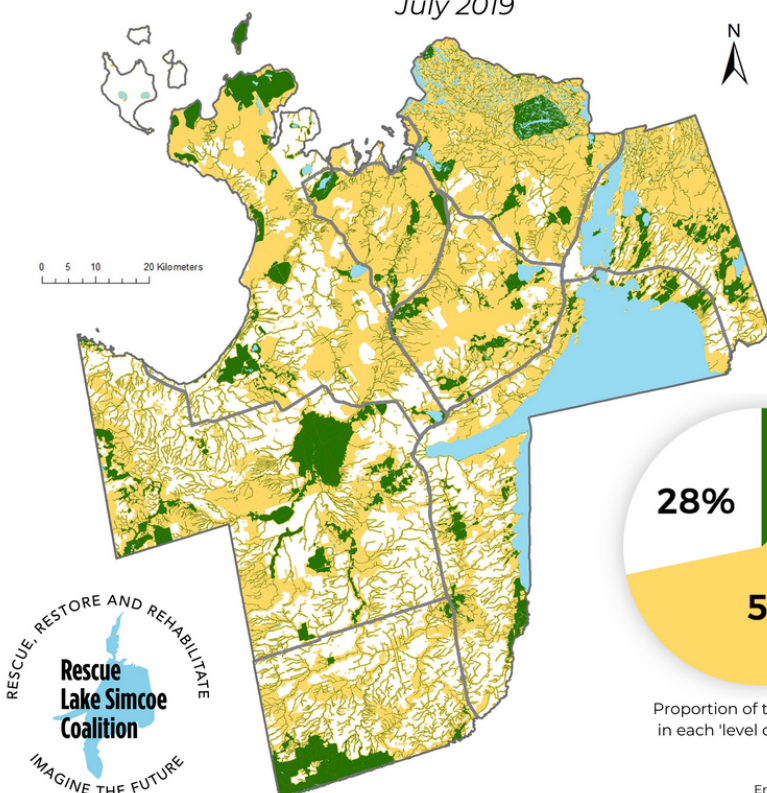
Our top priorities for the Lake Simcoe Protection Plan review:

1. Improve water quality by reducing phosphorus loads to the lake, to 44 tonnes per year as soon as possible, from urban and agricultural areas, and from aggregate and construction sites;
2. Support a healthy environment around the lake and reducing flooding impacts by protecting 40% of the watershed area's forests and wetlands.

Reducing phosphorus loads will mean fewer weeds and algae, and better water quality. Protecting more natural areas helps reduce flooding, filters contaminants from the air and water, and of course, provides space for wild creatures. The Nature Conservancy of Canada just named the Manitoulin-Lake Simcoe area one of Canada's crisis ecoregions, threatened by land-use fragmentation. Our own research confirms this, identifying that only 21% of the Lake Simcoe watershed's land is protected by strong provincial land use policies. (See map of environmental policy protections, below. Reports and maps are available at <https://rescuelakesimcoe.org/about-us/accomplishments/lake-simcoe-greenlands-project>)

COUNTY OF SIMCOE Map of Environmental Policy Protections

July 2019



Proportion of total land area in each 'level of protection'.

About this map:

The calculations do not include water bodies. This map is based on best-available data collected from multiple sources, including Land Information Ontario, the Lake Simcoe Region Conservation Authority, and the County of Simcoe. Still, there may be data gaps which result in some areas not being represented here.

What's missing?

- Additional greenlands that may be protected by lower tier municipalities that are not mapped;
- Habitats of sensitive species;
- Lands that are protected by individual land owners conservation agreements;
- Traditional Ecological Knowledge is not included in land analyses.

Legend		
Level	Definition	Examples of permitted activities
1. BEST POLICY PROTECTION	These features are subject to policies that prevent or tightly restrict development or other land cover change on them. An Environmental Impact Assessment (EIA) is required to demonstrate environmental impacts of permitted activities are minimal and can be mitigated. Level 1 includes mostly features protected by provincial policies: • significant woodlands; • significant wetlands; • provincially significant wetlands (PSWs); • Areas of Natural Scientific Interest (ANSIs); • Lake Simcoe Shoreline; • natural areas abutting Lake Simcoe; • significant wildlife habitat; • Provincial Parks; • Natural Areas (Niagara Escarpment Plan); • Core Areas (Oak Ridge Moraine Conservation Plan).	<ul style="list-style-type: none"> • new aggregate operations, with restoration and environmental impact requirements; • new business infrastructure that has been proven to have no alternative; • non-recreational recreation; • maintenance of existing infrastructure; • fish, forest, wildlife management; • stewardship and conservation activities; • flood or erosion control; • retrofits to stormwater facilities.
2. MODERATE POLICY PROTECTION	These features are subject to policies that allow some use alteration or land cover change, having met criteria and conditions. An Environmental Impact Assessment (EIA) is required to demonstrate that environmental impacts are minimal and can be mitigated. Level 2 includes: • setback and vegetation protection zones around protected features such as ANSIs, PSWs, permanent and intermittent streams and lakes; • significant groundwater recharge areas and highly vulnerable aquifers; • linkage areas (Oak Ridge Moraine); • Simcoe County Greenlands linkage areas; • features adjacent to Level 1 features.	<ul style="list-style-type: none"> • new aggregate operations, with restoration and environmental impact requirements; • having met criteria to demonstrate limited environmental impacts; • development and site alteration; • wind power facilities.
3. NOT PROTECTED BY ENVIRONMENTAL POLICY	These areas do not contain features that are protected. Level 3 includes: • farmland; • roads; • settlement areas and built up areas. The Greenbelt Protected Countryside designation is included because it does not protect Natural Heritage Features. It does, however, restrict settlement boundary expansion.	N/A

Map produced by Assim Sayed Mohammed and Kirby Calvert, Department of Geography, Environment and Geomatics, University of Guelph, on behalf of the Rescue Lake Simcoe Coalition.

Lake Simcoe Protection Plan Review

In 2007, concerned citizens cheered wildly when then-Premier McGuinty promised to introduce the Lake Simcoe Protection Act and declared “no new development will be allowed to harm the lake.”

The Lake Simcoe Protection Plan (LSPP) followed the Act and aims to **“protect, improve or restore the elements that contribute to the ecological health of the Lake Simcoe watershed, including water quality, hydrology, key natural heritage features and their functions...”** and more.

The Plan regulates lots of things that affect Lake Simcoe: sewage treatment plant limits, natural feature and shoreline protections, advanced stormwater management planning and implementation, and tougher development and construction standards aimed at reducing soil and water runoff and phosphorus loads to the Lake.

In 2021 the LSPP is being reviewed, and Jeff Yurek, the Minister of Environment, Conservation and Parks can decide if the LSPP needs to change. **Will changes IMPROVE the health of Lake Simcoe for swimming, fishing, boating and wildlife? That’s what the Rescue Lake Simcoe Coalition’s Protect Our Plan campaign is fighting for.**

To learn more about the Lake Simcoe Protection Plan, visit
www.RescueLakeSimcoe.org

And take action here
www.rescuelakesimcoe.org/take-action-2

What Lake Simcoe reflects back at us is that there are limits to growth. Municipalities will find it virtually impossible to achieve both the phosphorus reductions in the LSPP and accommodate the growth ordered by the province. Something’s got to give, and we don’t want it to be the Lake’s health. Further, because the Greenbelt doesn’t apply in Simcoe County, there aren’t firm policies that direct growth to existing towns. The Simcoe County portion of the Lake Simcoe watershed is experiencing enormous growth pressures in greenfields.

At the time of writing, the LSPP review public comment period has ended but no decisions have been made by the province about how, or if, the LSPP is going to be changed. Until this happens, all of us can keep Lake Simcoe in the news, contact Councillors and our MPPs to tell them that we love Lake Simcoe, and expect them to live up to their promises.



Advocates celebrate on the steps of Queen's Park following the passage of the Lake Simcoe Protection Act, 2008.



Why is sprawl bad for the lake?

Ten years ago the province acknowledged that approved development to 2031 in the watershed would ADD up to 15.3 Tonnes per year of phosphorus to the lake[2] while the LSPP says we need to cut phosphorus loads in half. The provincial Lake Simcoe Science and Coordinating Committees' formal advice to the Minister cautioned that development threatens the Lake's health, advising, "Ensure that the assimilative capacity and ecosystem health of the watershed are considered prior to any amendments to future growth projections." [3]

In contrast, the province has recently inflated growth projections using market demand and land needs assessment methodologies that have been called speculative and flawed by critics. The province has allowed municipalities to expand their settlement boundaries more easily and more often, and has allowed developers to build fewer homes per acre - essentially more sprawl.

[2] Ontario, 2010. *Lake Simcoe Phosphorus Reduction Strategy*.
<https://www.ontario.ca/page/lake-simcoe-phosphorus-reduction-strategy>

[3] Ontario, 2020. *Minister's 10-Year Report on Lake Simcoe*.
<https://www.ontario.ca/page/ministers-10-year-report-lake-simcoe>

This new growth will double the watershed's population by 2041 and add stress to the lake via phosphorus loads from construction in the watershed, and from land converted to urban uses. More development will also contribute to higher levels of salt in Lake Simcoe, a truly worrying trend.

No analysis has been done yet on the potential impacts of planned development to 2051 on the lake's health, but we can extrapolate that if urban growth from 2009 - 2031 was expected to add up to 15.3 Tonnes per year of phosphorus to the lake, then we should add another 15.3 tonnes to the load for the 2031 - 2051 period. This estimate may be on the low side since development approved in the earlier period was higher density than what is permitted in 2021. Ontario's recently changed Growth Plan policies encourage sprawl and allow communal sewage systems where municipal services do not exist. These changes increase pressure on Lake Simcoe as they allow more development in more places.

KEY POINTS:

- Development and construction negatively affect water quality when soil (which contains phosphorus) reaches the lake as dust, or runs downhill to the lake.
- Impacts of development are the only growing source of phosphorus going into the lake. Other sources of phosphorus, like farming, are relatively stable.
- The Lake Simcoe Protection Plan contains strong policies that address construction and stormwater impacts of development: these must be maintained.
- Recent changes to Growth Plan policies and environmentally protective legislation means we should expect more sprawl and more phosphorus added to Lake Simcoe.

1 GROWTH PLAN

Sprawl over all



Key Concerns:



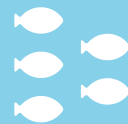
Loss of farmland
& natural areas



Worse water
quality



Climate change



Impacts on fish

Decisions about where and how to grow our communities directly impact our water quality and quantity, forests, wetlands and foodlands.

We can choose to provide housing and services within our existing communities or we can pave over wetlands and farmlands, and build sprawling suburbs that increase local greenhouse gas emissions and reduce water quality.

What would you choose?

"Sprawl is Ontario's oil sands."

- Dr. Dianne Saxe, former Environmental Commissioner of Ontario.

Car-dependent sprawl drives our carbon emissions and locks in harmful development patterns for centuries.

The Lake Simcoe Region Conservation Authority's Climate Change Mitigation Strategy says transportation accounted for 54% of total greenhouse gas emissions in the Lake Simcoe watershed in 2016. And further, "the business as usual scenario where population growth proceeds as projected, and no specific action is taken on emissions reduction, predicted an increase of 57% in net emissions from the 2016 baseline." [4]

Over the past ten years, there have been slight losses of forests and wetlands in the Lake Simcoe watershed. This rate of loss was an improvement over the impacts of decades of low-density sprawl.

But Ontario's planning policies from 2005 to 2018 that slowed habitat destruction by requiring more dense community building have been reversed since 2018.

Now the province is forcing municipalities to plan growth for the next 30 years with guidelines that favour sprawl. This makes land use less efficient and environmentally friendly. Sprawl is the most costly and environmentally damaging form of housing and rarely provides the rental and affordable housing that is urgently needed. It's expensive to service sprawl, and homeowners pay for it through taxes and by requiring vehicles to access basic services.

In a sensitive landscape like Simcoe County, and with Lake Simcoe still not healthy, we need to actively resist giving up more natural spaces that keep our lakes healthy and our water clean. We need to encourage growth that is sustainable - economically, socially and environmentally. If our sprawling patterns continue, it will make land speculators very rich, but our communities, our water, and our climate will suffer the long-term consequences.

[4] Lake Simcoe Region Conservation Authority, Climate Change Mitigation Strategy, 2020, p 3.

CALL TO ACTION:

Send an urgent letter to the government of Ontario:

simcoecountygreenbelt.ca/protect-lake-simcoe

Summary

- Rather than promote housing density, the province has allowed new houses to take up more space, which leaves less land for farming, nature, and the future.
- People need housing choices close to where they work and access services. Policies that encourage sprawl spread finite financial resources thinly and make it impossible for municipalities to properly service existing communities.
- Expanding the Greenbelt to Simcoe County would reduce farmland loss and constrain sprawl.
- More than 20 Minister's Zoning Orders (MZOs) have been requested in Simcoe County. Only 3 have been denied by the province. Many of these facilitate sprawl.

2 INNISFIL ORBIT MZO: Greenwashed Sprawl



Key Concerns:



Loss of farmland
& natural areas



Worse water
quality

When the Orbit plan started making the news, people thought it was a joke.

We wish that were true.

The Orbit is a massive development proposal on the outskirts of existing communities in Innisfil, between two small towns, less than 1 km from the shores of Lake Simcoe, centred on building a new GO train station in the middle of farm fields.

With virtually no public input on the project, only one week after the draft Minister's Zoning Order (MZO) was released on a Council agenda, Council passed a motion snuck onto the agenda that evening agreeing to send a letter to the Minister of Municipal Affairs and Housing indicating that the Town intended to pursue an MZO.

Innisfil Council has not addressed the public's concerns about using an MZO and has mischaracterized a frenzy of interest (actually alarm) as public support despite the absolute lack of evidence to support this claim.

The problems are many:

- There are no details about water and wastewater servicing, nor how this project would affect water quality and Lake Simcoe.
- The request is for a new town of up to 150,000 people 'over a generation', in a rural municipality of just 36,000. Something of this scale really ought to go through the normal planning process.
- MZO's are zoning orders written by the Minister of Municipal Affairs and Housing; they are not appealable, and there are no statutory requirements to consult the public. While this is irresistible to developers and their friends in the provincial government, it is a violation of Canadians' democratic rights to participate in planning their community.
- It is greenwash. While the draft MZO includes references to sustainability measures, there is absolutely nothing that compels confidence among environmentalists - there are no targets or benchmarks or even references to credible programs like LEED.
- The main developer also has the development rights to build the GO train station thanks to changes to provincial policies. [5] Councillors and staff have said that the developer needs the MZO and residential zoning to guarantee a return on his investment in building the GO train station. It appears that the province has written a law to allow developers to leverage their investments in GO train stations in order to get the zoning they want for their other development plans. The greenwashed Orbit may just be a foil for the developer, Cortel group, to achieve their ambitions to build a new cloverleaf at Innisfil 6th line and Hwy 400, and develop along the 10 km route from the Orbit to the 400.

[5] First through changes to the Provincial Policy Statement, 2020, S. 4.1.3 e, then with the *Transit Oriented Communities Act*, 2020.

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Summary

- MZO's do not have to comply with the policies of the Lake Simcoe Protection Plan nor many of the provincial policies that ensure prudent planning and protection of the environment.
- If the Orbit gets approved through an MZO, then the public has no meaningful opportunity for comment or to appeal.
- The Orbit would shift investments to the new community instead of putting high-speed transit where people already live and work.

3

BRADFORD BYPASS

1950s solutions for 21-century problems



Photo credit: Jeff Laidlaw

Key Concerns:



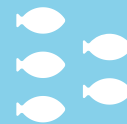
Loss of farmland
& natural areas



Worse water
quality



Climate change



Impacts on fish

The Bradford Bypass is a proposed 4-lane highway in the Lake Simcoe watershed that paves over Greenbelt land and would remove 22.1 hectares of high-quality woodlands; 17.2 hectares of Holland Marsh (designated environmentally sensitive area); 9.5 hectares of designated provincially significant wetlands; and 32.7 hectares of significant wildlife habitat.

It is intended to connect the 400 to the 404 to reduce traffic congestion and ease the movement of goods. **But did you know that building more highways actually increases traffic congestion?**

It's called **induced demand** and it helps explain why the 401, North America's widest highway, is also North America's most congested highway despite the number of lanes we add.

What reduces congestion and Greenhouse Gas emissions is providing people with other options like transit, bikes, walkways, and rail.

Highways facilitate sprawl, which directly impacts climate, water resources and community health.

The project has been discussed for decades and its Environmental Assessment, completed in 2002, is equally out of date. Since 2002 the Greenbelt and the Lake Simcoe Protection Acts passed, federal and provincial GHG emission reduction targets reflect a growing climate emergency, and the GO train north to Barrie has returned.

Traversing the East and West Holland Rivers, sensitive wetlands, and Greenbelt lands at the south end of Lake Simcoe, the Bradford Bypass is an albatross that seeks to use 1950s solutions for 21st-century problems.

Studies to determine its impact on Lake Simcoe and climate change have not been done, and the province is set to fast-track the project without those studies. The studies that *were* done predicted severe stormwater contamination, and severe impacts to fish habitat.

We feel that this highway needs proper study and sober second thought.

Do we still think building a highway through Greenbelt lands close to Lake Simcoe that fuels GHG emissions is the best, most cost-effective way to move people and goods?

Are there better ways to improve our communities while keeping Lake Simcoe healthy and the Greenbelt intact?

Yes. Of course there are.

At the very least, alternative routes should be considered, and more study and mitigation of the impacts to Lake Simcoe must be done before construction can begin. Currently, the province is proposing to fast track this highway and allow early work construction (e.g. bridges) before the studies are completed.

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Summary

- Previous governments declared that further study would be needed to ensure need and environmental protection. The province is currently seeking to remove the requirement to do further studies before work can begin.
- The studies for this highway concluded that this project would have adverse impacts on fish habitat, stormwater (flooding) and groundwater contamination. For these and other reasons, it was cancelled by previous governments.
- There are no in-depth traffic studies that demonstrate this highway will actually reduce traffic congestion. Alternatives such as increasing GO service or local transit have not been studied.
- Highways generally attract investment and pull investments and traffic away from other economic cores like downtowns and established economic centres.
- One of the main developers has already proposed that if the highway gets built it is hoping to turn its employment areas into residential. Highways are the gateway drug for sprawl.

4 MORE SEWAGE IN LAKE SIMCOE?

Upper York Sewage "Solution"



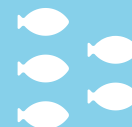
Key Concerns:



First Nations
consultation
obligations
not met



Worse water
quality



Impacts on fish

Lake Simcoe has its own legislation to reduce phosphorus loads to Lake Simcoe because it is a lake that is showing clear signs of phosphorus pollution and ecological stress.

One of those new laws in the Lake Simcoe Protection Plan is that **no new sewage treatment plants be built on the lake unless they are replacing an old one.**

So why are York and Durham Regions pushing so hard for the Upper York Sewage System (UYSS) to discharge into Lake Simcoe?

We fear that the drive to accommodate even more growth down the road has overshadowed its impacts.

The UYSS proponents claim it will not cause additional phosphorus pollution because phosphorus from the plant will be offset by other remediation and stormwater management activities elsewhere. Ministry of Natural Resources and Forestry staff said the efficacy of the rural and agricultural offsetting regime proposed was unproven. Offsetting phosphorus from point sources (sewage plant) with non-point source reductions (from agriculture etc.) has not been proven in other jurisdictions and tends not to meet lofty goals. Georgina Island First Nation wanted the offsets to be in place and tested before construction began, to make sure they work.

Unfortunately, this was not heeded; there are no contingency plans in place if the offsets don't work. Once it is built, if the offsets aren't working and the lake is suffering, there are no enforcement, accountability or remediation plans in place to fix it. Whether it works or not, Lake Simcoe will be stuck with the fallout. Getting the offsetting regime right is critical if this project goes ahead.

The Environmental Assessment on the UYSS also does not consider other emerging contaminants in the effluent such as pharmaceuticals, microplastics or personal care products. Georgina Island First Nation's request to study these impacts on long-term aquatic health and drinking water quality led to a literature review of health impacts that did not satisfy their concerns. They have requested that the long-term impacts of these contaminants on fish and aquatic life be considered and studied. York Region has refused.

This project did not meet its obligations to consult First Nations. The First Nations' constitutionally protected fishing rights cannot be protected when they have been given partial information on Total Phosphorus, emerging contaminants, and impacts to fish. Beyond the technicalities of the project, the First Nation has a spiritual connection to Lake Simcoe and beliefs that require that the Lake must not be polluted, or it will be damaged as a living being. These cultural values also need to be considered.

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Summary

- The Upper York Sewage Solution (UYSS) is intended to service growth to 2031 of 130,000 - 150,000 people in East Gwillimbury and Newmarket.
- The UYSS would add 40 million litres per day of effluent to the East Holland River which flows directly into the south end of Lake Simcoe.
- If phosphorus targets are met, it would still add 292 kg of Total Phosphorus per year to Lake Simcoe. If it doesn't meet its targets, it could add almost 1000 kg (or roughly 1 Tonne) of Total Phosphorus per year to the lake. These phosphorus loads are proposed to be offset.
- The UYSS does not consider long-term impacts of pharmaceuticals, microplastics or personal care products contained in the effluent that flows into Lake Simcoe.
- Originally, York Region and the province rejected servicing this growth via Lake Simcoe numerous times due to environmental impacts. What has changed?



2021: Make or Break for Lake Simcoe

We think Lake Simcoe is at a tipping point. Decisions made in 2021 will determine its fate. Massive effort and cost are being exerted to reduce the impacts of growth on Lake Simcoe. But unless we address Growth Plan-driven sprawl to 2051 and climate change, this approach is throwing good money after bad. Is the government of Ontario saving Lake Simcoe or not?

In a Council meeting in March, at which the Lake Simcoe Protection Plan review was discussed, Mayor Drew from Scugog said, “Here’s hoping the left hand knows what the right hand is doing.” We don’t want to leave that to chance. So far there is no indication that the left hand even cares what the right hand is doing at Lake Simcoe.

Recent changes to planning laws will lead to decades of 1950’s style development that will increase GHG emissions by at least 57% by 2031, which in turn reduces water quality in a variety of ways. [6]

Impacts are projected to include: warmer water, lower dissolved oxygen in the water for longer, less ice cover, more weeds and algae, more fragmented and less natural areas and habitats, biodiversity decline, increased salt levels in the water. Ultimately, it will make the lake less swimmable, fishable and drinkable.

With this report, we aim to peel off the facade: perpetual growth is not sustainable. If all of the projects described in this report go ahead, it signals that the left hand does not know what the right hand is doing, and that the environment, and the local sustainable recreation sector and all the jobs it supports, don’t matter to the government of Ontario.

How many warning signs will it take?

- The Lake Simcoe Region was listed as one of nine eco-regions in Canada in crisis. One of the main contributors is the removal of green space for urbanization (sprawl).
- There are at least 43 species at risk in the Lake Simcoe watershed.
- The Lake Simcoe Region Conservation Authority is worried about the lake becoming toxic due to salt from roads, in less than 60 years at this rate.
- From 2016 to 2041, the watershed's urban area will increase by approximately 50 percent and the watershed population will almost double.[7]

[7] Lake Simcoe Region Conservation Authority, Climate Change Mitigation Strategy, 2020, p 3.

[8] Ontario, 2020. *Minister's 10-Year Report on Lake Simcoe*. <https://www.ontario.ca/page/ministers-10-year-report-lake-simcoe>

Recommendations

- Respect the LSPP by stopping the use of Minister's Zoning Orders (MZOs) in the watershed, starting with denying the MZO for the Innisfil Orbit;
- Realign Growth Plan population minimums and low-density alternatives in the Lake Simcoe watershed by allowing only new development that can be serviced with today's phosphorus load caps on sewage treatment plants;
- Expand the Greenbelt to Simcoe County to better protect farmland and natural areas and constrain sprawl;
- Invest in existing communities; not sprawl;
- Stop the 400 - 404 Bradford Bypass as currently proposed, due to limited evaluation of environmental impacts to Lake Simcoe.

Eight Expectations for the Lake Simcoe Protection Plan (LSPP) review:

1. The Province of Ontario does not weaken targets, objectives, or timelines associated with phosphorus reduction;
2. Any changes made to LSPP policies will strengthen those policies, or will assist in the implementation of a policy related to achieving one of the LSPP's objectives;
3. The Province of Ontario revises the Phosphorus Reduction Strategy and identifies cost and funding sources for its implementation;
4. The Province of Ontario does not weaken phosphorus reduction and stormwater management requirements for development and aggregate industries;
5. New Sewage Treatment Plants are not permitted in the Lake Simcoe watershed;
6. Research, investment, and provincial direction for local implementation of the 40% high quality natural cover target of the LSPP result in a clear, time-bound plan and regulation for achieving 40% high quality natural cover target of the LSPP;
7. Investment is made in land trusts' acquisition of lands that contribute to achieving 40% high quality natural cover in the watershed;
8. The LSPP's commitments to involving First Nations in Plan implementation and policy development moving forward are fulfilled.





The Rescue Lake Simcoe Coalition is a lake-wide member-based organization, representing 25 groups in the Lake Simcoe watershed, that provides leadership and inspires people to take action to protect Lake Simcoe.

Rescue Lake Simcoe Charitable Foundation

rescuelakesimcoecoalition@gmail.com

www.rescuelakesimcoe.org



The Simcoe County Greenbelt Coalition is a diverse coalition of 40 organizations from across Simcoe County and the province calling on local and provincial leaders to better protect our water resources, green spaces and farmland through smart growth and sustainable policies including expansion of the Greenbelt into Simcoe County.

Simcoe County Greenbelt Coalition

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