



Town of The Blue Mountains

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Regular Mail

May 21, 2019

Nancy Mott
Niagara Escarpment Commission - Georgetown Office
232 Guelph Street
Georgetown, ON
L7G 4B1

RE: Town of The Blue Mountains Comments
Proposed Amendment to the Niagara Escarpment Plan & associated Development Permit
Sideroad 26/27, Osprey-Clearview Townline to Concession 10
Township of Clearview, County of Simcoe
ERO#: 013-4952
Ministry Reference#: MNRF INST 18/19

Dear Ms. Mott,

Thank you for the opportunity to provide comments regarding the above-noted applications. The Town has had the opportunity to review the supporting materials submitted by the Township of Clearview in support of the proposed amendment. According to the Township's supporting documentation the activities associated with the proposed reconstruction of 26/27 Sideroad will involve the following:

- expanding the width of the road
- changing the road from seasonal to a year round road (relative to municipal classification, but not with respect to Regulation 828)
- change the surface of the road from gravel to pavement
- require road cuts and contour changes

As summarized in the Planning Report prepared by Skelton Brumwell & Associates, the following are present on or within 120 metres of the Study Area:

- significant wetlands
- habitat of endangered and threatened species
- fish habitat

- Areas of Natural and Scientific Interest (ANSI) which include Provincial and Regional Life and Earth Science (ANSIs)
- Significant woodlands
- Significant wildlife habitat
- Habitat of special concern species
- Non-evaluated wetlands
- Permanent or intermittent streams
- Seepage areas/spring

The Town appreciates the associated planning decisions and legal agreements that have transpired over the years that have culminated in the requested amendment to the Niagara Escarpment Plan and Development Permit. We acknowledge the infrastructure-based basis for which the Township of Clearview is proceeding with the proposed Amendment and associated Development Permit. However, The Town of The Blue Mountains' interest in this matter relates to the proposed amendment's anticipated negative impact on transportation network connectivity in the Southern Georgian Bay region as well as the natural heritage features and functions of the Niagara Escarpment. We note that the assumed activities necessary to reconstruct the road may be understated in the supporting materials. This could result in unanticipated negative impacts on the natural heritage features and functions. Furthermore, the Town questions whether the proposed initial condition of the reconstructed road with a gravel surface and steep grades will be sufficient to serve as an inter-regional transportation connection between Simcoe County and Grey County.

With the planned closure of Road 91, and if utilization of a reconstructed 26/27 Sideroad route was truly the only alternative, the Town submits that the proposed reconstruction should involve a paved road surface at minimum. However, the Town respectfully suggests that not all other alternative inter-regional transportation routes have been considered. Once such alternative could involve a reconstructed Road 91 through the Walker Pit. We believe that until such time as the parties involved, including the Town of The Blue Mountains, have had sufficient opportunity to collaboratively explore such alternatives, a decision on the proposed Niagara Escarpment Plan Amendment and associated Development Permit is premature and does not conform with policies and intent of Niagara Escarpment Plan. Retaining and enhancing inter-regional transportation connectivity in the Southern Georgian Bay region is critical to the continued livability and economic viability of the area. The Niagara Escarpment's presence in the region not only presents an attractive natural asset that should be protected and maintained, but also represents a constraint to municipal and provincial authorities' ability to optimize existing infrastructure. We acknowledge this concept is embedded within the proposed reconstruction of the existing 26/27 Sideroad, however believe that other alternatives that would have less impact on the Niagara Escarpment should be considered first.

Please continue to keep us informed regarding this matter and we request notice of decision at the appropriate time that occurs. We look forward to working with Township of Clearview, Niagara Escarpment Commission and other pertinent stakeholder on these mutual issues as we strive towards positive outcomes.

Yours truly,

THE CORPORATION OF THE TOWN OF THE BLUE MOUNTAINS

Mayor Alar Soever
Town of The Blue Mountains

CC: Council, Town of The Blue Mountains (via e-mail)
Shawn Everitt, Interim CAO, Town of The Blue Mountains (via email)
Mayor Measures, Township of Clearview (via email)
Steve Sage, CAO, Township of Clearview (via email)