



SOUTH LAKE SIMCOE NATURALISTS

SLSN is an incorporated not-for-profit Member of Ontario Nature.

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Research Partner with The Zephyr Society of Lake Simcoe (www.zephyrsociety.ca)

2021-12-22

Company Representative: New Aerodrome Ontario 2021

Attention: Mr. Mauro Marchioni

comment@NewAerodromeOntario2021.ca

Dear Sir:

Context:

It is with great trepidation I write this letter to you with regard to your proposed Aerodrome project a fast-emerging threat to the natural and cultural heritage of the Town of Georgina, the Ontario Greenbelt and Lake Simcoe. Rather than professionally undertaking a community-based planning process with the local municipality politicians, and our local federal M.P. Scot Davidson, all declared unanimously opposed to your project. The local M.P.P. representing the Province of Ontario appears also not to be involved. The way your planning has been undertaken, and the scale of bad will you have generated with everyone involved, especially the local community people is despicable. We offer just three of many local media references, facebook comments and e-mails etc. regarding your lack of transparency, concerns about fill dumping and obvious lack of this conduct documented for all to see in the Town of Georgina Virtual Council Meeting the evening of 2021-12-15. Previous to this, and according to the local newspaper "the Georgina Post" articles below, a continuing concerning behaviour. Our membership is incredulous in their lack of respect of your actions to this point in this regard.

We provide science and community comments below, but under protest of your above documented actions to this point in this matter, and demonstratable poor planning, and thereby threatening the health of Lake Simcoe! I became aware of your project only recently from conversation and protestation of members of our organization.

Contrary to your stated understanding of your project in the Town of Georgina Virtual Council Meeting 2021-12-15, its implementation in our view at this point regards the fearful destructive fate of a very important natural heritage area and wildlife refugia, water resource stream headwater and groundwater area in the protected countryside of the Ontario Greenbelt. Nothing we have seen or heard to this point from you gives us any confidence otherwise. Given the lack of details (only basic information and a very conceptual map on an inconspicuous sign on the north side of Old Homestead Road) that we have not had reference to interrogate, the short community notice and short time to prepare comment, we relate concerns below. They can only be speculative as we have nothing scientific or otherwise to review and comment on from you. They are necessarily basic and provisional for the reasons listed above. Much more and will be said going forward if necessary.

Initial Technical Concerns:

Planning:

We reference the Town of Georgina Official Plan (2016) Section 2.2.3- Natural Environment Guiding Principle, reads as follows: The preservation, protection, enhancement and support of the natural heritage and hydrologic features, functions, attributes and interconnections of the natural environment is essential in order to maintain a sustainable ecosystem, not only to provide a healthy environment. We have seen no substantive reporting or documentation that any of these standards will be met by your proposed project, and therefore cannot support it.

Indeed, your proposed project is contrary to, or in conflict with, the Official Plan's Vision statement, the Natural Heritage Guiding Principle, the Rural and Agricultural Areas Guiding Principle, the Agricultural Area designation and Environmental Protection Area designation policies, and the Airports and Aerodrome policies (pointed out in Town of Georgina Report, Interoffice Memorandum, Dec. 3, 2021, Agenda item letter, Town of Georgina Meeting, 2021-12-15). We are of the same opinion as the Town of Georgina in this regard and are fully therefore opposed to your proposed project as minimally presented at this point.

In this same Town of Georgina municipal report, clearly documented is your project's non-compliance to other basic landuse planning directives and standards in this province, as far as we are aware from apparent lack of transparency and fair notice.

"The subject properties are designated a combination of Agricultural Protection Area (APA) and Environmental Protection Area (EPA) in the Town's Official Plan. All of the subject properties are subject to the Greenlands System Overlay (refer to Attachment 6, in the Town of Georgina Meeting Agenda documents). The intent of the APA designation is to protect prime agricultural areas for long-term

agricultural use. The intent of the EPA designation is to protect lands that contain environmental features and their buffers. The Greenland System overlay reflects the boundaries of the Natural Heritage System as defined in the GBP. The Greenlands System includes key natural heritage and hydrological features, their buffers, and linkages between features. Schedule 83 - Source Water Protection Areas shows a portion of the Subject Lands is located within a Significant Groundwater Recharge Area, Ecologically Significant Groundwater Recharge Area, and Highly Vulnerable Aquifer (refer to Attachment 7). Schedule C - Natural Hazards shows a portion of the Subject Lands, specifically the areas surrounding the southern watercourse, are hazard lands (refer to Attachment 8). In Section 9.2.6.2-Airports and Aerodrome, it states that "the Town shall not be supportive of airports and aerodrome facilities being located within the Environmental Protection Area designation or in locations that would result in land use conflicts with surrounding uses." (Town of Georgina Report, Interoffice Memorandum, Dec. 3, 2021, Agenda item letter, Town of Georgina Meeting, 2021-12-15).

Natural Environment and Landscape Ecology:

As with everything else about this proposed project there is little or no information of any kind upon which to comment even though your development group indicates you have undertaken consulting work of this kind in your public statements at the Town of Georgina Virtual Council Meeting the evening of 2021-12-15. We have great concern for all the myriad areas of natural heritage impact, ecology, conservation, and all species survival, particularly for species at risk at this point. From conversation and initial inquiry we offer a basic list of concerns.

- Proposed Aerodrome location is within a local documented migratory bird zone of flight activity, and breeding bird regular foraging movement area, for various species including but not limited to Sandhill crane, Tundra swan, Canada geese, various Sandpipers including some at risk and significant species (various waterfowl including historically phalarope --- species, and movements in this area of Georgina of other species of concern including Eastern Loggerhead shrike). The ecological relationship of the functional connection of Lake Simcoe, Georgina Island, Duclous Point and the natural wetland and seasonal ponding habitat on this site and others in the area are critical to these species and others and are of concern in relation to your project. All of which may be problematic for an aerodrome facility the size, complexity, and volume of use especially if it is to replace the Buttonville Airport in the G.T.A. as you advised, for the first time to our knowledge at the Town of Georgina Virtual Council Meeting the evening of 2021-12-15.
- The proposed Aerodrome is in what would seem like a most inappropriate geographic site location to undertake the kind of natural area disturbance proposed, being situated at an extensive complex wetland/wet forest and upland forest/ grassland meadow landscape, of important groundwater and riparian source function. The location area includes related noteworthy drumloid, and remnant glacial Lake Algonquin shoreline features, and associated other glaciolacustrine and presumed eolian deposits contributing to the important water resource functions. In particular, the bringing in of

massive volumes of fill from off site, and extensive grading change that will be needed for what the purported final site will be like, as in the basic concept drawing on the site sign, is concerning. Aerodrome flight/runway location aside (disputed by other community small airplane experts) there must be numerous much better sites for this kind of facility, that should be the subject of a Provincial/Federal Feasibility study in the G.T.A. to arrive at a rigorously determined location to locate a closing “Buttonville Airport”!

- With regard to hydrogeology, aquifer recharge, and ecological function affected by changes anticipated with this proposed aerodrome, to hydrogeology and surficial hydrology, we have significant concern with the proposed site grading anticipated and the level of science that would need to be presented supporting such proposed development. This is particularly concerning with the very large volume of fill expected to be brought to the site revealed at the Town of Georgina Virtual Council Meeting the evening of 2021-12-15.

Surficial and groundwater movement is typical to these local Georgina sand plain areas, sometimes low-lying lacustrine clay lenses or pans particularly at wetlands and streams which is the case here. Drainage and flow lines north-east to south at the extensive wetland/forests through expected significant seeps on the site, could be problematic over time if buried in huge volumes of fill, especially in the future with moisture model protections with climate change modelling for Southern Ontario. Local stream fish and other aquatic life impact is a concern. Again, we have not seen any science research or design information on these potential situational site impacts of the site changes anticipated. Local residents on wells have good reason to be concerned about their wells in the area given these considerations. Impact of significant aquifer recharge areas in the proposed fill and grade areas for an Aerodrome, and roads in the area is a concern to us, in the absence of much more detailed and rigorous science, and public release for review and comment.

Consequently, from past experience in other area OMB Hearings and Mediations we do not have confidence in the impact of the proposed lands works on local existing wells. The project proponent must be held responsible for hydrology and hydrogeological impact and must undertake detailed ground water investigations, analysis and long-term monitoring here, none of which have been released for review and comment. The glacial drumloid feature, in the low undulating Lake Simcoe sand plain of the Town of Georgina, has been identified as an important Groundwater Recharge Area

The site area ecologically is extremely strategic to the natural form and function of natural heritage in east Georgina and the Greenbelt. Its north-south landscape connection (corridor linkage) location, is strategic from a landscape ecological perspective linking two

critical east-west natural areas corridors across a very fragmented agricultural intermediary zone corridor. The value of the existing life science, natural areas also are very important and integral in terms of wildlife resources and Landscape Ecology (Core and Corridor natural habitat connections) within the Region of York as the central Region of York Greenlands System Vision maintaining connection to Lake Simcoe is significant. Wildlife movement corridors for mammal species like White-tailed deer (including winter congregation), coyote (Brush wolf), Red fox and others.

Further,

In summation regarding natural heritage and other landuse planning criteria, in concurrence with regard to the Town of Georgina's Official Plan, we believe your project is not appropriate on the site property. We refer you to the Town of Georgina narrative in this regard (Town of Georgina Report, Interoffice Memorandum, Dec. 3, 2021, Agenda item letter, Town of Georgina Meeting, 2021-12-15).

“Based on the limited information provided, it would appear that the proposed Aerodrome is of a much larger size and scale such that it would not comply with all of the requirements of Section 28. 4, and hence would not be in compliance with Zoning By-law No. 500. Concluding Comment The Project is proposed to be located in the heart of Georgina's Green/ands System, partially within, and largely surrounded by, provincially significant wetlands and significant woodlands. The site and surrounding area serves a provincially significant hydrological function as a groundwater recharge area and highly vulnerable aquifer, as noted by York Region and as shown on the provided LSRCA mapping. Based upon Provincial, Regional, and local planning policy, and without any detailed information on the Aerodrome proposal, Staff are of the opinion that the Subject Lands are not an appropriate location for the proposed Project, both from an environmental perspective and that of maintaining the rural character and visual landscape in this part of Georgina, which needs to be protected for current residents and future generations”.

We concur with this assessment.

Conclusion:

Although you state you do not have to meet any level of Ontario and municipal planning competency in your comment in Town of Georgina Virtual Council Meeting appearance (2021-12-15), and did not present detailed information, and make it available to all, your contention that Canadian federal Aeronautics Act (R.S., 1985, c. A-2) is of concern to our membership. Our organization is concerned and supportive of good planning and public transparency, and this does not appear to be that.

You advise that you have natural heritage consultants on the site working. We would be concerned that any natural heritage consultant would contract to be involved in the project you propose.

To properly and professionally evaluate the site, for your proposed purpose of plan we, and any competent natural heritage organization would need to have access to the site over several seasons to evaluate and make real defensible comment on your Aerodrome proposal.

The “friendly neighbour concept” is not in evidence in your project to this point, and community support is wanting in our opinion. You sir, need to remedy this situation.

In conclusion, and as previously identified there must be numerous much better sites for this kind of facility, that should be the subject of a Provincial/Federal Feasibility study in the G.T.A. to arrive at a rigorously determined location to re-locate a closing “Buttonville Airport”!

Sincerely,

Paul Harpley,

Paul Harpley BSc. (Hons.) M.A., Doctoral Researcher, York University
President, South Lake Simcoe Naturalists, Ontario Nature
Director, The Zephyr Society of Lake Simcoe, Wildlife Research Station

Recipient: 1995 Canada 125 Medal – Rouge River Valley Conservation

Recipient: 2012 Lieutenant Governor’s Ontario Heritage Award for Lifetime Achievement

Member, Public Advisory Committee, Federal Lake Simcoe and /South-eastern Georgian Bay Clean-Up Fund
 LSGBCUF 2007-2018

Fellow International, The Explorers Club

Fellow, The Royal Canadian Geographical Society

c.c. Scot Davidson M.P. York-Simcoe
 Federal Minister of Transportation
 Caroline Mulroney M.P.P. York-Simcoe
 Mayor and Council, Town of Georgina
 Anne Bell, Ontario Nature
 The Zephyr society of Lake Simcoe Research Organization
 Other Conservation and Community Partners

References: Georgina Post articles

2021-11-15 Georgina Post, <https://georginapost.com/2021/11/15/new-aerodrome-proposal-flies-under-the-radar-in-pefferlaw/>

2021-11-28 Georgina Post, <https://georginapost.com/2021/11/18/pefferlaw-residents-up-in-arms-over-aerodrome/>

2021-12-10 Georgina Post Newspaper (Paper edition), Pefferlaw aerodrome proposal lacks transparency, pp.3.

The South Lake Simcoe Naturalists (SLSN) is a fully federated member organization of Ontario Nature. Ontario Nature protects and restores natural habitats through research, education and conservation connecting thousands of individuals and communities to nature. Ontario Nature is a charitable organization representing some 25,000 members and supporters and over 140 member groups across Ontario. The South Lake Simcoe Naturalists represent interested individuals and families in Georgina and the greater South Lake Simcoe Region, and beyond. Our membership includes a wide range of people from diverse backgrounds and experience, professional to amateur, all naturalists interested in wildlife, nature, conservation, good planning and environmental issues. The SLSN have been incorporated and involved in the community for over 30 years. Our organization has made many past submissions on the Town of Georgina Official Plan and Sutton Secondary Plan reviews in the 1990's and have commented on previous development proposals in the Sutton Secondary Plan area and other community locations, the Greenbelt and Oak Ridges Moraine establishments and reviews, the 404 Highway consultations among other numerous other planning engagements.
