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May 15, 2019

Niagara Escarpment Commission
232 Guelph Street

GEORGETOWN ON L7G 4B1

Attention: Nancy Mott, Senior Planner nancy.mott@ontario.ca

Dear Niagara Escarpment Commission:

RE: NEP Nott SR 26-27 CR 91, proposed NEP amendment PS 215 18
Township of Clearview Sideroad 26-27, County of Simcoe Road No 91

Please find below preliminary comments regarding the Township of Clearview's proposed NEP amendment. I have supported nature and protection of the environment for over three decades across three Counties and beyond. Over the past four decades, a number of Local Municipalities, two Counties, and the public have had the benefit of my professional knowledge, experience, and skill set. The comments are provided as constructive criticism and are not intended to detract from the good services that are provided to the public.

As local municipal Council members and Recreation Committee members will remember, I promoted trail development in The Township of Oro-Medonte, the Town of The Blue Mountains, the Township of Clearview, and the Township of Essa, and I still support it today.

In the description of the instrument on the Environmental Registry it states, in part, that the purpose is "... to make improvements to Sideroad 26/27 to make it an all-season road to replace the County Road." Notwithstanding that the Township chose to

rush into a road improvement agreement without due diligence and assessment of adverse environmental impacts, the proposed road works, through Escarpment Natural and Protection Areas, do not bring Sideroad 26/27 up to a County engineering road standard and, therefore, do not provide for a replacement of the County Road within the overall and intertwined road networks of the County of Simcoe and the County of Grey and all of its existing attributes and benefits. Due to its many shortcomings, Sideroad 26/27, whether as a substandard rural gravel road or as a substandard local paved road, cannot be considered as a replacement to County Road No 91.

There is no justification for ignoring alternatives for the development of infrastructure in wetlands. In fact, there are at least two viable alternatives to consider: 1) keep the existing upper portion of County Road No 91 between Nott Concession 10 and the Osprey Clearview Townline (Simcoe Grey boundary) open as a County of Simcoe road, and 2) keep the existing upper portion of County Road No 91 between Nott Concession 10 and the Osprey Clearview Townline (Simcoe Grey boundary) open as a County of Simcoe road, re-align it, and optimize it to a County engineering road standard for the safety of the travelling public.

The Township could also consider stopping up and closing Sideroad 26/27 to through traffic and construct parking for the Bruce Trail crossing or Nottawasaga Lookout at or near the dead end(s) while minimizing the environmental impact now and for the future. The proposed road works are not necessary or a necessity. County Road No 91 is existing transportation infrastructure that provides for existing needs.

Had the Township's consultants undertaken a Class C Municipal Class Environmental Assessment including meaningful public consultations, all of this would already have been known, considered, and documented. Why did the Township's consultants classify the proposed works only as a Class A? Have socio-economic impacts, haul routes, traffic patterns, tourism, local growth, regional dynamics, and Provincial interests all been down-played to push this policy change through?

The Township's consultants appear to have more interest in bats than utilizing existing infrastructure, being County Road No 91, which should not be removed from public use. What led them down this slippery slope and how did they lose sight of the big picture?

The proposal will further erode the integrity of the Escarpment face, degrade the environment, cause harm to the extensive natural areas and wetlands, adversely affect the scenic views of the Escarpment, and compromise the regional transportation system and road network across the Counties and beyond; it is not transparent in its intended purpose or motivation. There is no public benefit to giving the upper portion of County Road No 91 and the underlying road allowance to the private owner of the quarry.

These are preliminary comments and questions. Further comments may be provided as additional information becomes available.

I understand that the Commission is in the process of reviewing the application and comments and that the application will be considered at a future meeting. Please provide any amendments or addendums to the application as they become available to the public. I wish to receive further notice of the status of this application and be advised of any scheduled meetings.

Sincerely,

J. A. Brydges

J. A. Brydges,
HBMath, CPA, CA, CGA, CMA

copy

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tá an féar i gcónaí níos géire ar an taobh eile den lochán
