



By e-mail

May 15, 2019

Warden and Members of Council

County of Grey

595 9th Ave. East Owen Sound, ON

N4K 3E3

Attention: Jacquelyn Morrison Deputy Clerk

Dear Warden and Members of Council:

RE: Proposed Closing of a Section of former County Road 91 in Clearview Township in the County of Simcoe

The Blue Mountain Watershed Trust wishes to make you aware of a potential serious transportation issue in Clearview Township in the County of Simcoe which will impact the Simcoe-Grey Counties' transportation network.

At the root of the problem is the proposed closing of a well-used section of former County Road 91 (Road 91) without providing an equivalent alternate route connecting Simcoe and Grey Counties.

The road proposed to replace the closed section of Road 91 is Clearview's Nottawaga, Side Road 26/27 and does not meet MTO or Clearview's Engineering Road Standards. This road is presently a narrow, steep, seasonal road that goes straight up the Escarpment at a grade of 14%, almost twice as steep as Road 91 in the section to be closed and turned over to Walker Industries Inc. The proposed road is limited to half load restrictions during the spring period and would not permit heavy commercial vehicles to use Side Road 26/27. Emergency vehicles and emergency detours would most likely not use Side Road 26/27.

Side Road 26/27 impacts the physical features such as steep slopes and groundwater. As well, Side Road 26/27 impacts the woodlands, wetlands, wildlife, aquatic organisms and fisheries. For this reason, the Niagara Escarpment Commission refused Clearview's development application by a vote of 12 to 1 in November 27, 2015. Grey County is represented on the Niagara Escarpment Commission (NEC). Clearview were the only member that did not support the NEC decision.

At a meeting held by Grey Highland area residents on May 9, 2019, the residents voiced their concerns with respect to the closing of Road 91. The reasons given were increased time to travel to work, concern

with how emergency vehicles would service the area, impact on trucks and commercial vehicles that cannot use the road during load restriction periods. No one supported Clearview's position.

Mayor McQueen and members of the Township of Grey Highlands were in attendance to hear residents' concerns.

The Mayor of the Town of The Blue Mountains was in attendance and voiced his concerns that the loss of this well-established major arterial inter-county road impacted the effectiveness of the Grey Simcoe County road network, impacted his municipality and the municipalities and commercial interests further up the Bruce Peninsula.

Lastly, we submit that Clearview carried out this proposed road project at the lowest level of Municipal Class Environmental Assessment (MCEA), a Schedule A+ undertaking and a schedule normally used for routine projects that do not have an environmental impact. No public information sessions are required by this level of MCEA. The fact the road development application road was refused by the Niagara Escarpment Commission and Clearview's consultants had to spend over two years carrying out additional environmental surveys resulting in over 800 pages of documentation should have made Clearview and the approval agencies realize the serious impact the proposed road has on the environment. No Public meetings were held to gain public input and consider alternatives despite our requests to carry out a higher schedule MCEA. The current Side Road 26/27 construction estimate has now increased from \$500,000 to \$4,000,000. This level of expenditure normally requires a Schedule C undertaking, which is what the BMWT recommends. For this reason, we requested a Bump-up of the MCEA for Side Road 26/27 from a Schedule A+ to a Schedule C undertaking. One that requires public input and the consideration of alternatives.

We would ask for your support on this project and appealing to the Minister of Environment Conservation and Parks, Rod Phillips that County Road 91 should not be closed and a higher level of MCEA be required.

Yours truly,



George Powell

BMWT

705 443 8443

C. Nancy Mott NEC

Minister Rod Phillips

MPP Jim Wilson

MPP Bill Walker