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February 25, 2015

Board of Directors
c/o Mr. Mike Walters, Chief Administrative Officer
Lake Simcoe Region Conservation Authority
Box 282
Newmarket, Ontario
L3Y 4X1

Dear Directors:

Re: Watershed Development Guidelines

I would like to provide staff and the Board with my comments on the December 2014 draft Watershed Development Guidelines, on behalf of my client the North Gwillimbury Forest Alliance. I previously wrote to Policy Review on September 26, 2014, commenting on the June 2014 draft - that letter is enclosed.

Subdivisions-in-Wetlands Policy and related issues

I am delighted that Guideline 8.3.2 in the June 2014 draft has been completely removed and has no equivalent in the December 2014 draft. That change eliminates my greatest concern with the earlier draft.

This change also has the effect of eliminating my concern with Section 2.4, Planning First Philosophy, described in my earlier letter.

The replacement Guideline 8.3.2 has the effect of permitting infrastructure, trails, and conservation within provincially significant wetlands, but (taking Guideline 8.3.3 into account) not within other wetlands over 2 ha, which I am sure is not what staff intend.

I support the changes that strengthen Guideline 8.3.3.

With these changes, and subject to my one reservation above, Section 8.3 is now good planning policy, consistent with applicable law and Provincial policy and with the policies of all nearby conservation authorities. Staff are to be congratulated for proposing complete repeal of the subdivisions-in-wetlands policy.

However, Section 8.5 remains unchanged, and my concerns with it remain, for the reasons described in my earlier letter.

Other issues

None of the other issues identified in my earlier letter have been addressed.

While all these points are important and should be addressed, two in particular stand out:

- The change from "Policies" to "Guidelines". I should add that the draft document retains a split personality - in some cases, crossreferences to other policies refer to "guidelines", in other cases, "policies".

- Allowing staff to make minor technical amendments to the Guidelines.

I hope these comments will assist staff in developing the final version of the Guidelines they will be proposing, and in your own consideration of those Guidelines.

Yours sincerely,

[original signed by]

Anthony Usher, MCIP, RPP

cc. Policy Review