

Hon. Andrea Khanjin MPP  
Minister of the Environment, Conservation and Parks  
College Park, 5th Floor, 777 Bay St  
Toronto, ON  
M7A 2J3



November 9, 2023

Dear Minister Khanjin,

Congratulations on your appointment as Minister of the Environment, Conservation and Parks! As an MPP for the region who I know cares about Lake Simcoe and the people who love it, we have high hopes for your work on this file.

As you know, The Rescue Lake Simcoe Coalition is a lake-wide member-based organization, representing 30 groups in the Lake Simcoe watershed, that provides leadership and inspires people to take action to protect Lake Simcoe.

Naturally, this is an opportune time to revisit our priorities. I hope this short list will focus our future conversations and help you determine what actions will be winners with the public. I am enclosing previous correspondence with your predecessor with this letter.

Let's start at home with policy and projects to support Lake Simcoe.

1. We need to see shovels in the ground by 2025 on the Lake Simcoe Phosphorous Recycling Facility, as announced by your predecessor and as described in Bill 23, where it is outlined that the timing is at the discretion of your Ministry.
2. We hope you will take concrete action to address salt pollution by limiting legal liability for salt applicators and property owners conditional on training and best practices, as has occurred in other jurisdictions. As part of this liability change, you would need to develop strict ecological targets for Lake Simcoe salt reduction as part of that process; a Provincial Water Quality Objective (PWQO) for chloride has been recommended, but further investigation is needed into how hard and soft water lakes' tolerance differs. Simply supporting "best practices" is inadequate given the plan to double the watershed's population in the next 20-30 years. Further, wrapping Lake Simcoe's south shore in 70 km of additional highways, the Bradford Bypass and the 404 extension, will contribute to the chloride pollution problem significantly.
3. We urge you to finish the review of the Lake Simcoe Protection Plan, which was legislated for completion in 2019 but is still pending. We urge you to stick with the science-based target of reducing phosphorous pollution in the Lake to 44 tonnes; do not

adjust the phosphorus target to be weaker. We have provided detailed advice<sup>1</sup> numbers of times on this file.

4. We have asked for policy protection for Lake Simcoe's high quality natural cover since 2010, using the province's high quality natural cover map. We respectfully suggest the aforementioned map and Lake Simcoe Region Conservation Authority's (LSRCA) Natural Heritage System should be your guide for prioritizing natural heritage land protection.
5. However, if this government is more interested in pursuing conservation by creating parks (which is much more expensive)) then please consider acquiring Geneva Park on Lake Couchiching, which is for sale, and turning this property into a new conservation area or park.
6. On a related note, we urge you to reinstate the Growth Plan and its Natural Heritage System and Agricultural Lands System protections. We made many recommendations specific to Oro Medonte, Ramara and Innisfil's Natural Heritage Systems<sup>2</sup>, and it looked like a positive situation in Ramara and Innisfil, and then Ontario proposed to cancel the Growth Plan entirely.<sup>3</sup> We urge you to retain natural-heritage protections through the Growth Plan.
7. We urge you to fund and implement flood management, climate adaptation, greening and green infrastructure projects, including Holland Marsh Best Management Practices and naturalized phosphorous remediation projects identified by Holland Marsh Drainage Superintendent Frank Jonkman and endorsed by Bradford West Gwillimbury Council.

More generally, we would also suggest broader policy approaches to provincial issues:

1. Repeal sections of Bill 23:
  - In Bill 23, Conservation Authorities (CA's) lost the power to comment on planning applications other than those affecting natural heritage features identified in the Provincial Policy Statement (PPS) (which the province has proposed to change drastically). But, CAs retained the water balance, stormwater review roles. Now the Permit to Take Water / Environmental Activity Sector Registry (PTTW / EASR) proposal essentially says that removals of water up to 379,000 litres per day do

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<sup>1</sup> RLSC recommendations on the review of the LSPP  
<https://rescuelakesimcoe.org/wp-content/uploads/2021/03/FINAL-Long-Policy-recommendations-LSPP-Mr3.pdf>

<sup>2</sup> R:SCsSubmission re proposed Natural Heritage System Simcoe County  
<https://rescuelakesimcoe.org/wp-content/uploads/2021/12/letter-to-Province-re-P-reduction-and-NHS-w-S-C-Submission-attached.pdf>

<sup>3</sup> <https://ero.ontario.ca/notice/019-6813> Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.

not need to be reported to the Conservation Authority. Under this new legislative framework, there would be no more up-front review of PTTW, therefore it is unclear if any cumulative water taking analysis is going to be performed before dewatering occurs. It is imperative that the province reviews its ability to deliver on the *Lake Simcoe Protection Act* and Plan while also gutting water protection policies.

- Reinstatement of the ecological offsetting program enabled under the LSPP; this action is key to making changes on the landscapes that absorb water and reduce the impacts of flooding, which in turn drives phosphorus loads.
- Changes under schedule 3 have reduced development charges paid by developers. These changes are increasing municipal tax rates when homeowners are facing many financial stresses.
- We would also like to see “housing services” be one of the things that development charges can be collected for.<sup>4</sup> We have a real housing crisis that seriously affects the poor and this policy means less social housing would be built.<sup>5</sup>

2. Do not proceed with proposals to modernize water taking and PTTW.<sup>6</sup> At best such measures are half-baked; at worst they are dangerous and unsupported by any evidence of need from an environmental perspective.

3. Do not change the PPS and Growth Plan as currently proposed. Rather, seek out and listen to expert advice from planners and environmental advocates and Conservation Authorities. The constant changes in Ontario’s land-use planning system are a mess and hinder home building. Many of the powers left with the CAs rest on there being a PPS that protects natural heritage. We need a Growth Plan Natural Heritage System.

4. Stop MZOs and arbitrary boundary expansions, unsupported by planning analysis and advice, and follow the advice of your housing task force. For instance, the Orbit in Innisfil is not supportable. The timing for building a GO station has been handed over to developers. Williams Treaties First Nations have an order to quash the application for failure of duty to consult. There have been no planning applications made, there is no affordable housing, and no GO station planned. It’s unclear what the benefit **to anyone** is of this highly controversial —and locally very unpopular — project. This project may also unfairly disrupt water / wastewater servicing allocations that have been made following due process. Finally, MZOs skip all of the steps that

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<sup>4</sup> Bill 23, Schedule 3 S 2(4).

<sup>5</sup> In Newmarket, the first purpose built rental building built in 20 years in York Region is now posting 1 bedroom apartments at \$2300 a month. There is a MASSIVE shortage of rental properties.  
<https://www.homestead.ca/apartments/212-davis-apartments>

<sup>6</sup> Exploring changes to streamline the permit-by-rule framework, ERO number 019-6951 [ero.ontario.ca/notice/019-6951](https://ero.ontario.ca/notice/019-6951); Streamlining permissions for water takings for construction site dewatering activities and foundation drains, ERO number 019-6853 [ero.ontario.ca/notice/019-6853](https://ero.ontario.ca/notice/019-6853); Streamlining environmental permissions for waste management systems under the Environmental Activity and Sector Registry, ERO number 019-6963 [ero.ontario.ca/notice/019-6963](https://ero.ontario.ca/notice/019-6963); Streamlining environmental permissions for stormwater management under the Environmental Activity and Sector Registry, ERO number 019-6928 [ero.ontario.ca/notice/019-6928](https://ero.ontario.ca/notice/019-6928)

would tell us, for instance, whether there is wastewater capacity (operational constraints and environmental), for this project, and at what cost.

5. Put all Greenbelt lands back in the Greenbelt. Do not entertain any urban boundary expansions into the Greenbelt. Any unscheduled reviews of the Greenbelt policy must only consider additions to the Greenbelt.

Thank you for your attention to these matters. We look forward to working with you and meeting with you to discuss these and other priorities soon.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'Claire Malcolmson'.

Claire Malcolmson

Executive Director, Rescue Lake Simcoe Coalition

[www.rescuelakesimcoe.org](http://www.rescuelakesimcoe.org)

And Margaret Prophet, Simcoe County Greenbelt Coalition

cc

Hon. Caroline Mulroney, MPP for York—Simcoe

Hon. Doug Downey, MPP for Barrie—Springwater—Oro Medonte

Hon. Jill Dunlop, MPP for Simcoe North

Hon. Stephen Lecce, MPP for King—Vaughan

Laurie Scott, MPP for Haliburton—Kawartha Lakes—Brock

Dawn Gallagher-Murphy, MPP for Newmarket—Aurora

Sandy Shaw MPP, Official Opposition Environment Critic

Mary-Margaret McMahon MPP, Ontario Liberal Environment Critic

Mike Schrenier MPP, Leader of the Ontario Green Party

Councillor Jonathan Scott, Town of Bradford West Gwillimbury

Councillor Dave Neeson, Town of Georgina

Acting Mayor Scott Crone, Town of East Gwillimbury

Lake Simcoe Region Conservation Authority

## **Appendix 1/1**

### **Executive summary of the RLSC's 2023 letter to Minister Piccini, April 2023**

Full letter available here:

<https://docs.google.com/document/d/1podSGIzqTQImi1DloyXRJCvQ3EeEx3bG/edit?usp=sharing&oid=102332304570163642431&rtpof=true&sd=true>

This letter summarizes our top requests to the Ministry, and addresses some specific concerns about policy consistency, implementation and follow through, raised in the most recently released Annual Report on Lake Simcoe, 2019 - 2020.

#### **Our top requests:**

- Release all the science that has been collected about Lake Simcoe, including important fisheries catch information on Lake Trout and Whitefish;
- Ensure that lukewarm results are not presented as wins; ie. oxygen levels are not really improving<sup>7</sup>, and yet the province keeps claiming they are;
- In the Lake Simcoe Protection Plan (LSPP) review, identify how the province is handling the following:
  - o The Lake Simcoe Phosphorus Offset program (now that the Lake Simcoe Region Conservation Authority cannot perform this task);
  - o How Minister's Zoning Orders (MZOs) and planned urban / suburban growth impacts conform to the LSPP's phosphorus reduction target;
  - o Updating the Lake Simcoe Phosphorus Reduction Strategy, which was slated for 2021;
  - o Meeting the LSPP target of 40% High Quality Natural Cover in the Lake Simcoe watershed?
  - o How water and wastewater management will remain cost-effective, efficient, be coordinated across the watershed, and continue to conform to the LSPP in the absence of Regional planning.

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<sup>7</sup> "From 2003 to 2017, the [Minimum volume-weighted hypolimnetic dissolved oxygen] MVWHDO concentration has remained relatively stable, showing no significant increase," Science and Research Technical Report TR-23. The status of coldwater fishes of Lake Simcoe, 2018. p. 7. Queen's Printer.

- Host a public session in which the MoECP presents the data that justifies any proposed changes to the LSPP in order to be transparent and get public support for any science-based, defensible changes;
- Show the public that the province is taking a leadership role in getting the phosphorus reclamation plant built on the Holland River. There has been no progress to date, and surely you want to show some results;
- Chloride contamination is getting worse, and yet the province insists the Bradford Bypass “will not pollute Lake Simcoe” although it is not even studying the impacts to Lake Simcoe. Reconsider the highway route and / or develop strong salt mitigation policies. Supporting “best practices” is clearly inadequate given the plan to double the watershed’s population in the next 20 – 30 years;
- Make the agendas and minutes of the Lake Simcoe Science and Coordinating Committees public;
- We wish to remind the province as well that we have made numerous detailed submissions regarding the LSPP Review. See our recommendations here:  
[https://rescuelakesimcoe.org/wp-content/uploads/2019/03/Protect\\_Our\\_Plan-LSPP\\_Ask\\_Mr\\_23.pdf](https://rescuelakesimcoe.org/wp-content/uploads/2019/03/Protect_Our_Plan-LSPP_Ask_Mr_23.pdf)