



Corporate Services
Office of the Chief Planner

via email only

March 3, 2023

Impact Assessment Agency of Canada
Ontario Region
600-55 York Street
Toronto, Ontario
M5J 1R7

Attention: Spencer Roth, Project Analyst

Email: designationontario@iaac-aeic.gc.ca

Dear Spencer Roth:

**Re: Designation Request for the Baldwin East Aerodrome Project under the Impact Assessment Act
7818 & 7486 Old Homestead Road
Town of Georgina
Regional File No.: PSC.21.G.0661**

We are pleased to respond to your February 20, 2023 letter inviting York Region's input in relation to an Impact Assessment Review Agency Designation Request by Pefferlaw Area Ratepayers (the "Pefferlaw Ratepayers") pursuant to subsection 9(1) of the *Impact Assessment Act* (the "Act"). The Pefferlaw Ratepayers request relates to the proposed Baldwin East Aerodrome Project (the "Project").

While we understand airports are under Federal jurisdiction, and that this proposal will be considered in accordance with Federal legislation and with Transport Canada being the approval authority, we respectfully submit that the concerns identified by the ratepayers constitute compelling "exceptional circumstances" related to the Project, and should be carefully considered by the Minister of Environment and Climate Change (the "Minister"), Transport Canada and the Impact Assessment Agency of Canada (the "Agency").

We also respectfully submit that Provincial, Regional and Local policies and context should be taken into consideration by both Transport Canada and by the Agency in relation to the Project generally and the requested designation under subsection 9(1) of the Act. To date, we understand that this does not appear to have occurred.

The Regional Municipality of York, 17250 Yonge Street, Newmarket, Ontario L3Y 6Z1
Tel: 905-830-4444, 1-877-464-YORK (1-877-464-9675)
Internet: www.york.ca

Impact Assessment Agency of Canada**Invitation for Input - Proposed General Aviation Aerodrome****Planning Policy Context**

The subject lands are located within Greenbelt Plan Area, within Natural Heritage System of the Protected Countryside designation per the Greenbelt Plan, 2017. The site is also within the “Greenbelt Protected Countryside” as shown on Map 1 of the York Region Official Plan, 2022 (YROP). Map 2 shows the site is entirely within the Regional Greenlands System. The lands are within 120m of a Life Science Area of Natural and Scientific Interest (Map 3).

Further, Provincially Significant/ Provincial Plan Area Wetlands and watercourses are located on the southern portion of the site and woodlands are located throughout as shown on Maps 4 & 5. The site is also within the “Agricultural Area” on Map 8 (YROP). Old Homestead Road is a Regional road with a planned street width of up to 30m. A Significant Groundwater Recharge Area (SGRA) and Highly Vulnerable Aquifers (HVA) are located on the subject lands (Maps 13 & 14).

Finally, the site is located within the Lake Simcoe Watershed and accordingly subject to the applicable policies of the Lake Simcoe Protection Plan, 2009 (LSPP), and the lands are currently designated “Agricultural Protection Area”, “Environmental Protection Area” and entirely within the “Greenlands System” in the Town of Georgina Official Plan, 2016.

Specific Considerations

York Region Planning staff have undertaken a review of this proposal and provide the following comments based upon Provincial and Municipal policies:

Natural Heritage

Based on the concept provided, it appears that development and site alteration is proposed within a number of important environmental features such as a watercourse, Provincially Significant wetlands, significant woodlands, and their associated vegetation protection zones (vpz). Some of these features are recognized as key natural heritage and key hydrologic features. The environmental features on these lands also help to make up a larger environmental system identified at all three levels of government: 1) The Natural Heritage System of the Greenbelt Plan, 2) the York Region’s Regional Greenlands System, and 3) the Town of Georgina’s Greenland System.

Provincial, Regional and Local planning policies aim to protect and prevent impact to these features by generally directing, and sometimes prohibiting (i.e. Provincially Significant Wetlands and Significant Woodlands, etc.), development outside of their boundaries, as well as limiting development and site alteration within these natural heritage systems. For example, YROP policy 2.1.9 prohibits development and site alteration within the Regional Greenlands System, save and except certain uses as outlined by the Plan, and requires that any application be accompanied by an Environmental Impact Study. Additionally, YROP policies 2.2.35 and 2.2.44 prohibit

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development within evaluated wetlands as shown on Map 4 and within significant woodlands and their vpz, with some limited exception.

The site is also within a Significant Groundwater Recharge Area and a Highly Vulnerable Aquifer. Importantly, the proposed Project would meet the definition of “Major Development” under the Lake Simcoe Protection Plan and the YROP, and therefore should appropriately consider Provincial, Regional and Local planning policies associated with these features.

Given the proposal was not accompanied by a supporting environmental study, the full extent of natural features, nor the extent of the proposal’s environmental impacts are currently unassessed and unknown.

In accordance with York Region’s Memorandum of Understanding with the Lake Simcoe Region Conservation Authority (“LSRCA”), York Region relies on LSRCA to review and provide comment on natural heritage matters and associated applicable Provincial plans, as well as natural hazard matters. In this regard, the LSRCA can provide more detailed comments and technical review on matters of natural heritage as outlined above.

Agricultural Area

The subject lands are located within the Agricultural Area as shown on Map 8 of the YROP, and a portion of the lands are currently designated “Agricultural Protection Area” in the Town of Georgina Official Plan. Protection of the Agricultural Area is a primary planning objective of all three levels of Government. Permitted uses typically include normal farm practices, a full range of agricultural uses including agricultural-related uses and on-farm diversified uses, along with other limited uses. These uses are permitted based on Provincial Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas.

Based on current air photos, it appears a portion of the subject lands, located outside of the environmental features, are currently being used for agricultural purposes. It appears that existing agricultural uses are also located in proximity to the subject lands. Policy 3.1.3.3 of the Greenbelt Plan generally discourages non-agricultural uses in prime agricultural areas and indicates they may only be permitted after the completion of an Agricultural Impact Assessment.

The proposed Project removes lands from the agricultural system, contrary to the current planning policy regime. Further, the full impacts of the proposed Project to the agricultural system and its function are currently unassessed or unknown as supporting studies were not provided. We strongly recommend the proposal be reconsidered/reassessed in the context of the applicable agricultural planning policies.

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Regional Roads

Old Homestead Road is under York Region's jurisdiction with a planned street width of up to 30 m. However, without the ability to require site plan approval, conditions for conveyance, access and right-of-way improvements cannot be imposed through this means.

Summary

Based on our review of this proposal, we are concerned with the absence of supporting studies and assessments, potential impacts to important and significant environmental features and to the agricultural area and surrounding agricultural community without any demonstrated need or benefits to the community. York Region welcomes and supports a Federal Impact Assessment to consider these important matters.

Should you have any questions regarding the above, please contact Karen Whitney, Director, Community Planning and Development Services at extension 71505 or through electronic mail at karen.whitney@york.ca.

Sincerely,

<Original signed by>

Paul Freeman, MCIP, RPP
Chief Planner

Copy to: Wayne Emmerson, York Region Chairman and CEO
Lina Bigioni, Chief of Staff, York Region
Mayor Quirk, Mayor, Town of Georgina
Naomi Davison, Regional Councillor, Town of Georgina
Bruce Macgregor, Chief Administrative Officer, York Region
Ryan Cronsberry, Chief Administrative Officer, Town of Georgina
Dino Basso, Commissioner, York Region
Michael Bigioni, Director of Legislative Services, Town Solicitor, Town of Georgina
Dan Kuzmyk, Regional Solicitor and General Counsel, York Region
Shawn Nastke, Director, Town of Georgina
Denis Beaulieu, Director, Town of Georgina
Karen Whitney, Director, York Region