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# TRINISON

MANAGEMENT CORP.

January 30, 2003

Regional Municipality of Halton  
Planning & Public Works Department  
1151 Bronte Road  
Oakville, Ontario  
L6M 3L1

RECEIVED  
FEB - 4 2003  
HALTON REGION  
PLANNING AND  
PUBLIC WORKS DEPT.

Attention: **Mr. Ho Wong**  
**Manager, Long Range Planning**

Dear Mr. Wong:

**RE: Significant Woodlands in the Regional  
Municipality of Halton  
Technical Paper #6**

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As you know, over the course of the last year, we have had multiple meetings with Regional staff and have expressed several serious concerns regarding the Significant Woodlands report. We have also engaged Ecoplans Ltd. to undertake a professional peer review and their comments have also been submitted (copy attached). We have also presented our concerns to the EEAC Committee. In short, we have attempted to provide input that is both professional and positive in nature but have received no indication that any of our legitimate concerns are being addressed.

Without re-iterating all of our previous comments, we continue to have serious concerns that the criteria are arbitrary and not scientifically supportable. We also maintain that any proposed policy which designates 97% of all woodlots as "significant" is a misinterpretation of the intent of the Provincial Policy Statement.

Finally, we continue to maintain that the policy is redundant in designated Urban Areas and creates confusion for local municipalities regarding woodlot preservation goals. In short, we believe that the entire greenlands strategy should be re-examined.

Notwithstanding the above, we now are submitting our request to introduce a policy framework to deal specifically with HUSP urban expansion areas in Halton.

As discussed, the environmental and woodlot evaluation process associated with current day sub-watershed studies is both extensive and comprehensive, and far exceeds the normal EIA evaluation contemplated for significant woodlands. A great deal of effort and work is put into these undertakings. The issues normally addressed in an EIA are addressed in equal or greater detail in the sub-watershed level assessment.

In our opinion, it is both redundant and counter productive to conduct extensive EIA work in woodlots if such woodlots are also being examined in the context of a detailed sub-watershed process. The overlap and redundancy is obvious and north Oakville is a prime example of such redundancy.

Accordingly, we ask that the following provision be added to the proposed greenlands strategy and be included in the updated Regional Official Plan provisions as follows:

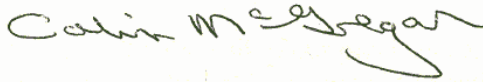
“Without amendment to the [Regional] Official Plan, any Urban Expansion Area as identified in Regional OPA No. 8 which has, or will be, the subject of a municipally initiated sub-watershed study completed no earlier than two (2) years prior to the adoption of this policy, will be deemed to be in full compliance with the provisions of the greenlands strategy. Accordingly, the woodlot protection provisions of the sub-watershed study will take precedence over Regional provisions and no further EIA's will be required prior to the adoption of Secondary Plans”

Please note that we wish you to proceed with this policy regardless of how you address our previous concerns raised about the criteria and other items.

We would appreciate a response as to how you intend to deal with our request.

Yours very truly,

**TRINISON MANAGEMENT INC.**



**Colin McGregor**  
Vice President, Land Development

CM/ss

cc: Pat Murphy – Region of Halton (via fax only)  
Jane Clohecy – Region of Halton (via fax only)  
Carolyn Hart – Region of Halton (via fax only)