



August 11, 2024

20+ Questions

The assembly of 770 acres of prime farmland in Wilmot Township to create an industrial mega site has been done in secret and the Region of Waterloo has refused to provide any of the many documents we requested through our Freedom of Information Requests. We now believe that no studies were done and this whole project has been poorly thought out.

There has been very limited information released by the Region and no public consultations. Politicians and staff at both levels of government have been prevented from speaking out by either a Non Disclosure Agreement or by the Municipal Act due to all discussions being held in closed meeting.

As a result, we filed Freedom of Information Requests to obtain the studies done to support the mega site but all of our requests were denied.

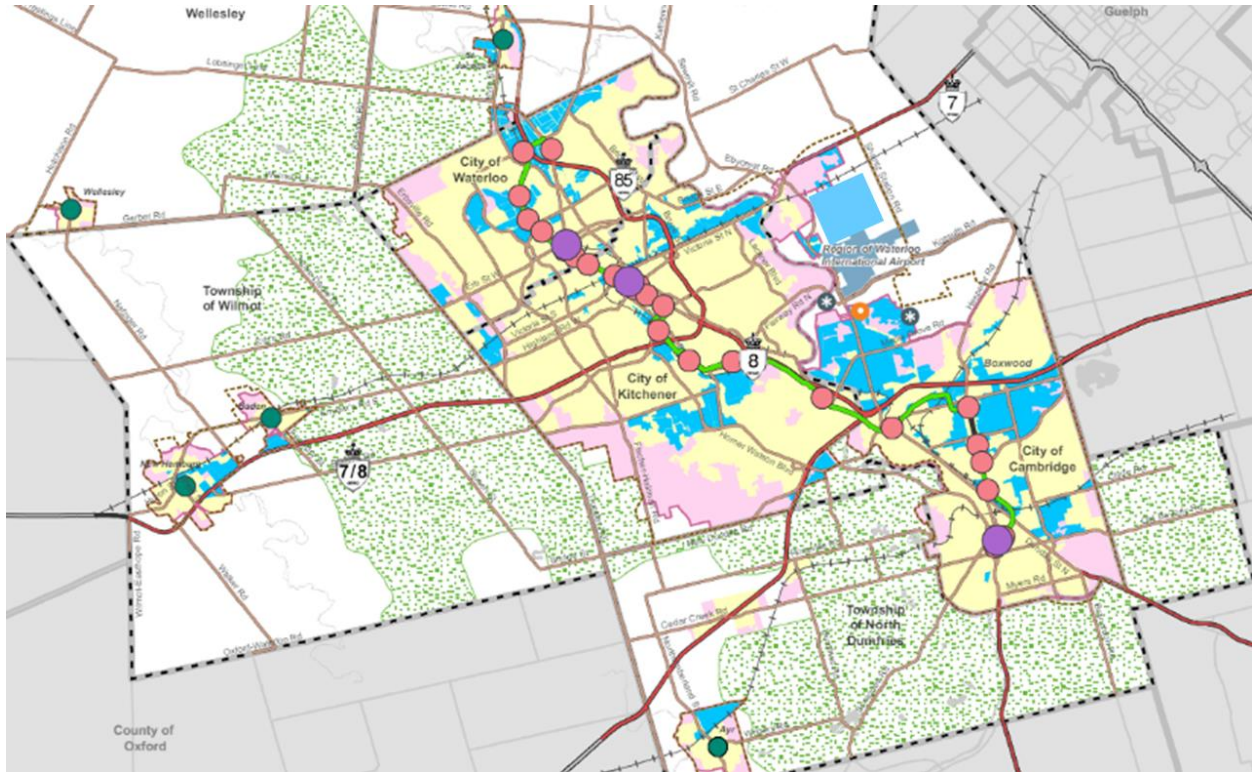
The following questions would normally have been answered by a proper planning studies – in particular a comprehensive Environmental Assessment formerly required by law, however since no studies have been done or made public, we have generated a list of questions that need to be asked before spending millions of dollars on a massive site that may not even be suitable.

EMPLOYMENT LANDS

Industrial employment lands need to be on marginal land close to:

- large urban workforce
- public transit
- plentiful water, sewage, and wastewater
- railway lines
- major roads and transportation
- support industries

Industrial sites should not be developed on Prime Agricultural Land or near Primary Groundwater Recharge areas.



In the map above from the broadly supported recent Regional Official Plan, industrial land is shown in blue. The Official Plan does not allocate any industrial land south of Highway 7 and 8 at New Hamburg. The majority of industrial land in the Region is located close to the workforce, infrastructure, and transportation arteries of Kitchener, Waterloo and Cambridge. The Region has consistently focussed employment and industrial lands on the East side of Kitchener/Waterloo near the airport, the South side of Kitchener, and the North side of Cambridge where rail, road, sewer and water infrastructure already exist.

The proposed mega-site is supposed to bring employment to Wilmot. The unemployment rate in Wilmot is 6.8%. According to Statistics Canada, there are about 12,000 residents between the ages of 10 to 65, or about 815 residents who are looking for work. 95% of the employees will be commuting from outside of the Township (Kitchener, Waterloo, Cambridge, Stratford, Woodstock, etc).

The economic benefit to Wilmot will be very small. It's hard to imagine shift workers shopping in Wilmot, other than for gasoline that they will need for their commute, so the impact on the environment and most aspect of the quality of life in Wilmot will likely be much larger than the impact on the local economy.

The current economic value of farmland and the spin off employment has been completely discounted by the proponents of this development. On average, Ontario farms contribute \$47 billion to the Ontario GDP. In addition, to on-farm employment, jobs are created in food

processing, seed and fertilizer sales, farm machinery sales, banking, insurance, veterinary care, research and others.

WHO IS RESPONSIBLE FOR THIS INDUSTRIAL MEGA SITE?

Karen Redman, Regional Chair of Waterloo Region said the land acquisition is a project of both the Region and the Township of Wilmot. Natasha Salonen, Mayor of the Township of Wilmot, said it's the Region of Waterloo. Mike Harris Junior, the Minister of Red Tape Reduction, said the Province has nothing to do with the land assembly and it is the Region. Rob Flack, the Minister of Agriculture, Food and Agribusiness said the Province is funding the land acquisition.

For months the public has been trying to get answers and learn who is behind this massive land assembly. Which level of government is willing to destroy decades of previous planning efforts to protect farmland and grow sustainably within settlement area boundaries, or at least within the Countryside Line? There has been nothing but conflicting answers and finger pointing by all politicians with the public left in the dark about who is really driving this and who demanded everything be done under an NDA with no public consultation/engagement.

1. Who is really responsible for the land acquisition?
2. We understand the need for confidentiality when negotiating land values, but who decided to develop this mega site without any public input?

PLANNING PROCESS

3. Why has the Region's planning process not been followed?
4. Why is prime farmland being assembled for the mega site when it is outside of the Countryside line and is protected from non-agricultural development by Chapter 6 of the Region of Waterloo's Official Plan and in violation of Section 24 (1) of the Provincial Planning Act.
5. Why were the landowners threatened with expropriation?
6. What is being done to protect the surrounding farmland or is this the start of industrial sprawl?
7. Why are the landowners being offered the agricultural value for their land when the Region clearly considers this to be industrial land worth many times what is being offered?
8. Who benefits from the Region buying land at agricultural process and selling it at industrial prices to a private company?
9. Although no date has been set, the Province's Bill 185 has removed all planning authority from the Region. Wilmot Township will assume responsibility for developing the 770 acres into a shovel ready industrial site. How much will it cost Wilmot's taxpayers to finance the project and to hire the necessary staff to develop the site?

10. Any development charges will not be recovered until the site is sold to an unknown company. Under the Municipal Act, Wilmot can not borrow more than 25% of its “own source” revenues which are property taxes and water & sanitary rates. According to Wilmot’s Asset Management Plan 2022, the current fiscal capacity is not sustainable. How does the Township plan to finance this project?

PRIME FARMLAND

11. Why was \$160,000+ of corn destroyed just weeks before it could be harvested?
12. Farmland is a non renewable resource. Why is agricultural land being paved over?
13. Ontario imports \$10 billion more food than we export. Why are we destroying farmland when, in 2022, about 6.9 million Canadians live in food-insecure households?
14. Only 5% of Ontario’s landmass is farmable and only 1% is considered prime. Why is agricultural land being destroyed when there are other potential sites available in the Region?
15. Adjacent farms depend on the surface water run off from the 770 acres for irrigation. What studies have been done regarding the impact of this development on nearby farms?
16. The transportation requirements for farms is complicated. What studies have been done regarding the impact of this development on transportation (milk pickup, feed delivery, nutrient management, moving farm machinery, etc?)

TYPES OF INDUSTRIES

Our Freedom of Information Request asked what types of industries were being considered for this site. Answers to our questions were denied, however Regional Chair Karen Redman has admitted that there is no current customer for the lands and they don’t even know what sort of industry will be built at the site.

The Regional Official Plan calls for greenfield developments to be a minimum of 50 people and jobs per hectare. (20 people and jobs per acre)

Depending on the ultimate final industry, the 770 acre mega site could have a upwards of 15,500 employees. Assuming 3 shifts, there could be about 5,000 employees on site at any one time.

17. What type of industries will support 15,000 employees?
18. How much water is required for the employees and for the manufacturing process?
19. Why did the Region say that the site must be contiguous when this proposed location is already divided into 3 parcels by Nafziger Rd and the Hydro right of way that goes through the property?
 - The area to the east of Nafziger is approximately 80 acres

- The area north of the Hydro Right of Way is approximately 450 acres
- The area south of the Hydro Right of Way is approximately 240 acres

There are plenty of existing undeveloped parcels of employment and industrial lands in Waterloo Region where a 200 acre parcel, a 350 acre parcel, a 150 acre parcel, etc. could be combined into larger joint facility already without this destruction of so much prime farmland in Wilmot Township.

20. Are there plans to locate additional support industries on the south side of Bleams Rd and/or the east side of Wilmot Centre Road resulting in even further farmland loss?
21. Is the Hydro Right of Way to be moved or relocated?
22. Is Nafziger Road to be closed?
23. Why did the Region say the site must be flat for “consistent grading considerations” but not acknowledge that this site is not level with significant hills and contours.? The site has an almost 60 foot (six storey) grade change over its length, and given it is located adjacent to one of the most hilly parts of our region significant work and expense will be required to make it level?
24. Why have no details be released about other sites that were considered for the is industrial mega-site?
25. Why can’t reclaimed aggregate pits, brownfield, greyfield, or already compromised and degraded lands be used instead of these prime agricultural fields located 25km from our population centres?

WATER

The Region claims that the site has “nearby existing infrastructure for water / wastewater” but the water supply in Wilmot is limited and Regional Chair Karen Redman has admitted a pipeline is going to be needed to transport all wastewater and sewage to the City of Kitchener facilities in the Grand River watershed. The report the Region referenced in the Freedom For Information Request (which is publicly available) shows that if all the building currently on the Wilmot Township’s Development Listing are built, there is sufficient capacity in the Baden / New Hamburg for an additional 13,000 to 15,000 people. The mega site will consume all the remaining water capacity of the Baden / New Hamburg water system potentially leaving no capacity for any township population growth.

Waterloo Region is the largest user of underground drinking water in Canada. If this development compromises our aquifer, our only alternative is a pipeline to Lake Erie.

26. What ramifications were discussed with Regional water experts regarding the planning of this mega site?
27. 80% of the Regions’ potable water supply comes from groundwater. Why is this industrial site being located just metres away from the recharge area?

28. Will the site depend on the Regions water system or will they be allowed to drill their own wells?
29. Groundwater supplies the wells of rural residents. What studies have been done to show the water table will not be affected by this site?

SEWAGE

The same report shows that the Baden / New Hamburg Wastewater Treatment Plant will be at capacity if all the dwellings on the New Hamburg Development Listing are built. Once we pointed this out, the Region switched to claiming a sewer line will be built to Kitchener.

30. Where and how will the sewer connect to the Kitchener Sewer System?
 - Is there a suitable connection at Mannheim or is expropriation, demolition, and excavation required to reach the Kitchener waster water treatment plant?
31. How many pumping stations are to be built and at what cost, not only to build but to operate annually for decades?
32. Can the Grand River assimilate the additional sewage and industrial waste from this massive plant?
33. What studies have been done to show a pipeline to Kitchener is feasible?
34. What will the impact be on municipalities such as Kitchener and Waterloo that were counting on the sewage capacity of these facilities and the Grand River?
35. What has the response been to all this additional waste and sewage being dumped into the Grand River watershed from downstream communities that are almost totally dependent solely on the Grand River for all of their drinking water needs?

RAIL CONNECTION

There are significant consequences of connecting the mega site to CN North that have not been addressed by the Region.

36. Where will the new rail spur cross Highway 7 & 8 to reach this mega site?
37. A bridge must be built on Hwy 8 to carry vehicular traffic over the rail spur. How much land must be acquired for the bridge?
38. How much additional land must be acquired to provide the rail connection with both east bound and west bound access to CN North?
39. How many trains will go through the centre of Baden each day?
40. Automotive freight trains are about 750 metres long. How will this affect vehicle traffic in the main intersection in Baden?
41. Are the hours of operation through Baden to be restricted?
42. The Iron Horse Trail in Waterloo and Kitchener used to be the eastbound connection to southbound CPKC to Cambridge. Is the Iron Horse Trail to be converted back to track to

accommodate the connection between automotive plants on CP Rail (Ingersoll, Woodstock, Cambridge)?

43. If the Iron Horse Trail is not rebuilt for trains, then the freight trains connecting to CPKC will have to enter the VIA Rail station in Kitchener in order to switch tracks between CN North and CPKC. What is the impact on 2 way all day GO service if trains have to enter the VIA Rail Station?
44. Have Metrolinx and VIA Rail been consulted about the impacts of this mega industrial development?
45. What is the impact of 750 metre trains on the grade crossings in Kitchener? (Victoria St S, Queen St S, Mill St, Ottawa St. S, Hayward Ave, Wabanaki Dr., King St. E, River Rd E, Riverbank Dr?)
46. Have developers of the lands north of Hwy 8 been advised that a rail line will bisect the land between Nafziger Rd and Foundry St?
47. As the developments are subdivided will a notice be registered on the title to prevent owners from taking legal action regarding the noise and pollution from the trains?

TRUCK AND COMMUTER TRAFFIC

If the mega site transports a significant amount of material by truck, there are a many questions about routing. Also, given the tens of thousands of additional residents to be located between Baden and New Hamburg the traffic considerations will become significant and far reaching to take a small township of only rural roads and a single highway, and rapidly reconfigure it to handle hundreds of thousands of vehicle trips per day.

48. What studies were done by the Ministry of Transportation to identify potential problems with truck traffic?
49. How are westbound trucks getting to the 401 ? Are they going through Washington and Drumbo? Or through Haysville and Bright? Or through Haysville, Punkydoodle Corners to Tavistock, Hickson and Woodstock? Or Hwy 8 to Shakespeare, Tavistock, Hickson and Woodstock? Or will Westbound trucks have to travel all the way to Kitchener eastbound on Highway 7/8 and then to Highway 401 using King Street South to get onto the westbound Highway 401?
50. If eastbound trucks are using Hwy 8, then an interchange will need to be built at Nafziger Rd. Considering that the province refused to pay for the Belleville interchange on the 401, has the Province committed to pay for any upgrades to Hwy 8?
51. Are new interchanges on Highway 401 going to be required to handle the future volumes of traffic anticipated? At what cost?
52. Will all five main intersections with traffic lights on Highway 7/8 need to be upgraded to full interchanges? (Nafziger Road, Hamilton/Bleams Road, Peel Street, Walker Road, Perth Road 101/Wilmot Easthope Road)? At what cost?
53. What road upgrades are necessary for local settlement areas?

54. Have any studies been done to determine the impact of the additional truck and train traffic on Erb Transport in Baden?

COSTS

55. Has this proposed Wilmot mega-industrial site had a full costing of anticipated expenditures?
56. What costs have been budgeted to build the highway interchanges?
57. What costs have been budgeted to build the rail spur, extensions, and road crossings including Highway 7/8?
58. What costs have been budgeted for the land acquisition for the rail line north of Hwy 8?
59. What costs have been budgeted for upgrading Nafziger Rd, Bleams Rd, Wilmot Centre Road and other Wilmot local roads to 4 lane roads capable of handling both tremendous shift change traffic and continuous truck traffic?
60. What portion of these costs will be paid for by Wilmot residents on their taxes?
61. What portion of these costs have been guaranteed by the Provincial or Federal Governments?
62. How much money has already been spent on this project?

ALTERNATE SITES

The CAMI plant in Ingersoll is 570 acres of which only 235 acres are used for manufacturing, vehicle storage, and rail yards.

The Toyota Plant in Woodstock is 622 acres but only 327 acres are used for manufacturing, vehicle storage, and rail yards.

The Toyota Plant in Cambridge is 350 acres for manufacturing, vehicle storage, and rail yards.

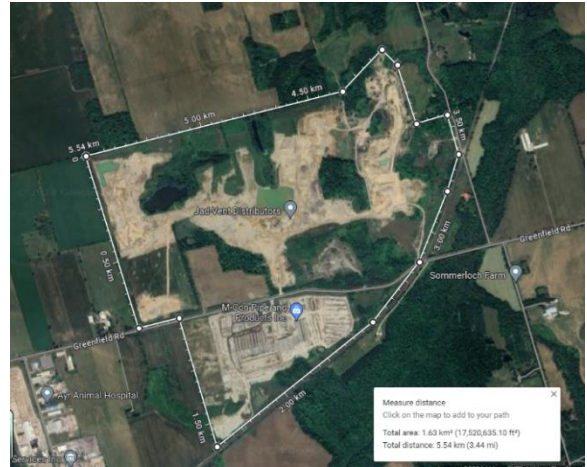
The Honda Alliston plant is 450 acres for manufacturing, vehicle storage, and rail yards.

All local automotive plants are on CP Rail.

63. Why is 770 acres required when the automotive plants are 450 acres or less?
64. Why is a contiguous site required?
65. Why is it necessary to locate the mega site outside of the East Side Employment lands near the airport where the Official Plan has already designated 1572 acres of potential employment sites.

Five minutes on Google Maps turned up a 400 acre site near Ayr that is close to CP Rail and the 401. This site is on marginal farmland and is close to support industries. This is located in a direct line between the automotive plants in Cambridge, Ingersoll and Woodstock and has direct access to the 401, both eastbound and westbound. No additional highway interchanges or road bridges over a rail spur would be required.

66. What other sites have been considered?



FIRST RESPONDERS

- 67. What plans have been made to replace Wilmot's volunteer fire department?
- 68. Has the extra policing for 24 hour traffic been discussed with Regional Police?
- 69. What is the impact on the already overburdened ambulance service?

COMMITMENT TO 50 BY 30

Councils in both the Region of Waterloo and the Township of Wilmot have voted to reduce their greenhouse gas emissions by 50% by 2030. Currently the Region is exceeding their target by about 380,000 tonnes per year and Wilmot is exceeding their target by 13,000 tonnes per year.

- 70. What is the impact of locating the mega site so far from the work force going to have on the Region's commitment to 50 by 30?
- 71. What are the embedded carbon due to building interchanges, bridges, sewer and pumping stations, and the upgrading of roads?
- 72. What is the Region and Township going to do to mitigate the extra GHG emissions created by this site?