

MNR's Mandate Comments:

Endangered Threatened Species

- Policy consistent with PPS 2005 wording within EP policy (but does policy apply to those habitats not currently mapped or identified but which would be encountered at pre-consultation and application stage?-not clear)
- Also 'council shall have regard for'(old PPS) any other Sign NHF that may become identified (is this consistent with PPS 2005?); this does not say won't develop in ETspp habitat
- Amendments to the OP, its schedules and appendices should not be necessary for updating of ETspp habitat mapping/occurrence information; updated information should automatically be considered and relative policies triggered

Significant Wildlife Habitat

Deer Yards

- Correct information displayed but in appendix not on schedules
- No specific policies/ need for scoped assessment/ mitigation
- Paul suggests the extent of deer yards be displayed as significant forest/woodland habitat in the schedules; current policy for forest resources should be reworded to include consideration of and mitigation for wildlife habitat and other values

Significant Fish Habitat (spawning, rearing, etc)

- Correct information displayed but in appendix not on schedules

Alvar

- Referenced only once as 'Ottawa River and limestone bluff... possesses alvar soil conditions producing globally rare plants' (EP section); this description needs to be built upon (Daryl, needs to elaborate on this feature, text and suggested policy)
- Not mapped or identified as a Sig NHF or SWH; a polygon similar to what was provided to Township planner in spring 2006 should be used

Other (ie. Other wetlands, habitats and species of Conservation Concern)

- Schedules identify only locally significant wetlands (not in EP designation so how will they be zoned? EP policy and zoning should apply)
- policy unclear about how local wetlands will be handled (ie. Local wetlands not specifically referenced in EP policies, should be better described)
- A policy should be included that as components of SWH are encountered, appropriately scoped assessments must be undertaken in support of a development application and mitigation measures appropriately implemented; Natural Heritage Reference Manual, SWH technical guide, as well as the Decision Support System could be referenced in these policies.

Provincially Significant Wetlands

- Four identified in schedules, displayed properly (ie. On top of water)
- 120 adjacent lands not shown on schedule; not a big deal

- Development may be permitted in the PSW as per EIS; big deal-this is incorrect, not consistent with the County OP and the PPS 2006; to be corrected
- MNR may be consulted with respect to scope and TOR for EIS, in a technical capacity only
- Amendments to the OP, its schedules and appendices should not be necessary for incorporation of newly identified or evaluated wetlands; PSW provisions must apply as these wetlands become evaluated/assessed and data shared with Township through County

ANSI

- White L. Fen Prov. Sign ANSI Mapping incorrect on schedule (Daryl?)-this ansi is in Kemptville District, only the adjacent lands and related policies apply to McNab... (Daryl, correct me if there's a mistake here)
- No description and no policy has been identified for the ANSI or its adjacent lands. Note the County OP does not define 'adjacent lands' to ANSI. The township should state that development may be permitted only in accordance with

Floodplain Hazard:

- 10.2.1 eludes to lack of floodplain mapping in certain areas and that 'these policies will apply' but then the PPS policies are not laid out (ie. Can develop in the floodway?)
- rather this section allows that in some cases development in the floodplain may be considered provided that listed requirements are adhered to; it is not clear if this policy applies to areas with or those lacking FDRP mapping
- for Madawaska and other unmapped rivers, one zone approach to floodplain only- this is not clear as per current wording
- any floodproofing shall be consistent with natural resource management best practices and council will be sure that no impacts will result to the ecological features and functions of the water body

Other Hazards:

- introduction to hazards states that Karst or unstable bedrock has not been specifically identified in the municipality but exists within municipalities to the west?? ; MNR input package flagged high potential of karst in association with bluff/bedrock within the municipality;
- no policy for geotechnical investigations in areas that may confirm to consist of karst bedrock

Water

Water Setback Provisions

- General water setback (30 m), remove 'generally'; describe council recognizes and intends to promote the ribbon of life/various natural and aesthetic values of vegetated / natural riparian areas

Stormwater Management

- Should be referenced in both general development policy and plan of subdivision development criteria
- Should require level 1 (quantity) and level 2 (quality) management
- Require some level of site assessment and mitigation prior to siting of ponds/facilities within or immediately adjacent to an existing NNF (MNR AOC/local values)

Source Water

- Question to MOE: should raised/engineered fill beds be allowed in floodplains (ie. Fringe), groundwater recharge zones, and in areas affected by joint-cracked bedrock (ie. Alvar/karst)?

Mineral Aggregate

- Appears that considerable areas of deposits have been peeled back (Keltie to confirm)
- Introduction to this section should reference that fact that currently there is a shortage of unconsolidated (ie. Fill sand and gravel) within the municipality and this will result in economic impacts and traffic impacts as demand rises with projected development increases within the municipality;
- Introduction could lay out that municipality has a significant bedrock deposit, for the most part not existent within the rest of the County;
- the policy objectives fall short on protection/ limiting sterilization of land containing these resources; only existing pits and quarries are 'protected'
- expansions of operations (quarries, pits, concrete batching facilities) 'shall be strictly prohibited' 'in areas in close proximity to significant residential development' ... there are no definitions of these terms
- policies specifically do not permit concrete plants
- only temporary asphalt plants associated with a wayside pit/quarry for a specific township/county/MTO road project are acceptable
- policies direct future ZB to zone mineral areas in a 'non development type zone' (ie. No structural uses)... is this ok?
- Wayside pits and quarries: should they not be scoped for EndThreSpp habitat... they seem exempt of policies?
- Policy should reference ability to protect / preserve topsoil through bylaw under the Municipal Act
- Some of the resource areas designated may be removed by ZBA... in consultation with County; do we want to be involved?
- The above policy needs clarification that major incursions (perhaps a size threshold?) require an OPA? And that only minor portions on the periphery and within close proximity to sensitive land uses could be adjusted
- Influence areas/distances have been increased above MOE guidelines; is this ok?
- Applications for pits/quarries below watertable shall be discouraged; is this ok?
- Discouraging incompatible land uses: rezoning, applications to be carefully considered in consultation with MNR

- Implementation of study results in consultation with provincial ministries; do we want to be involved?
- All pit / quarry uses to satisfy requirements (relating to water) of MOE and Twp?
- Why reference Madawaska and Ottawa River floodplains in this section?
- Permanent Asphalt and concrete batching plants, washing plants shall require OPA (only require ZBA in County OP)... 'significant amounts of residential development' what is 'significant'?

Other MNR:

The plan does not reference the current PPS (2005). The language in the policies mirrors that of County OP and old PPS (ie. Will have regard to / for, will consider etc); so is this OP in conformity to the Planning Act/PPS?

Many existing NHF have not been mapped or identified at all and there's no clear direction in the plan that when 'discovered/encountered/confirmed' to exist at time of pre-consultation or application, that features will be protected consistent with the PPS (depending on significance of feature;

Errors in what is included in the mapping (ie. Shrike cloud, deer yards). What about a natural heritage system as required per the PPS? It could be interpreted that only the features briefly mentioned in the introduction to the EP policies and only those designated EP on schedules will be offered consideration/ protection.

Not clear how Council or planner for township will 'consider' the mapped features contained in the appendix; appendices are not binding as based on interpretation of section 1.9 (5). They will 'have regard for' and ensure planning decisions are consistent with PPS (which PPS??) MPR will not trigger a scoped assessment, EIS or consultation with MNR (only with County) when development is proposed in the areas shown on the appendix. County did not 'approve' the appendices.

Could there be a section dealing with/describing the benefits of pre-consultation, the supporting information required, the lead for the process, any costs to applicant., MNR and MAH role, etc?

Other Non-MNR:

General Development Policies 'must be considered'; should be strengthened to mean that development proposals will be consistent with/ satisfy the intent and criteria as per the general development policies and the specific land division policies.