

Kannakko, Kris (MNR)

From: Gaweda, Joanna (MNR)
Sent: December 19, 2006 11:45 AM
To: Gallivan, Joe (MAH)
Subject: mcnab op comments
Attachments: McNab Draft OP_ MNR Comments to MAH_ Dec 19 2006.pdf; App 1 alvar range.pdf; Braeside Alvar_ Briefing on a SWH component within McNab Township V 1 0.pdf

Hello!

Attached are the PDF's of our letter to you (signed original in the mail) and the supporting material we've pulled together for the alvar and a figure. This email will be followed with another map in pdf that will show you where the alvar is in relation to other features in the Township. I wish you, your family and loved ones a terrific Christmas!

Talk to you in the New Year (I'm back on the 3rd).

Joanna Gaweda

District Planner
Pembroke District
tel: 613-732-5522
fax: 613-732-2972
joanna.gaweda@ontario.ca

Ministry of
Natural Resources

Ministère des
Richesses naturelles

31 Riverside Drive
Pembroke, Ontario K8A 8R6

Telephone: (613) 732-5520
Facsimile: (613) 732-2972

December 19, 2006

Joe Gullivan, Planner
Ontario Ministry of Municipal Affairs and Housing
Municipal Services Office, Kingston Region
8 Estate Lane, Rockwood House
Kingston, ON
K7M 9A8

Mr. Gullivan:

**RE: MNR comments, Draft Official Plan, McNab Braeside
MMAH File 47-DP-0160-06001**

Thank you for circulating the above file. We have taken the opportunity to briefly outline the Ministry of Natural Resources (MNR), Pembroke District's comments as they relate to our mandate under the current Provincial Policy Statement. If you require more detailed comments by section of the draft Official Plan (OP), we would be happy to meet to discuss those.

General Comments:

Recognizing that this draft is at least the fifth draft or version in this process, we suggest that the draft circulated still requires attention and or additional detail (ex. Mineral Aggregate, Natural Heritage Systems, Endangered and Threatened Species Habitat, Significant Wildlife Habitat, Provincially Significant Wetlands, Natural Hazards, updating of information).

Pre-consultation:

Earlier this year (ie. Spring 2006) District staff participated in several meetings with the Township's planner and submitted a detailed Natural Resource Information Package. As part of those 'pre-consultation steps' the Township received, among other information:

- 1) the most current known species at risk and otherwise 'sensitive data';
- 2) mapping of important components (ie. High potential endangered and threatened species mapping based on a variety of best available data, components of significant wildlife habitat ex. Braeside alvar, deer yards, other); we recommended the Township could use these to define and delineate their own 'natural heritage system' or 'significant wildlife habitat';
- 3) sample policies that could be used or built upon.

We have enclosed the mapping for your reference. It is not clear if or how this information was used, since there is no natural heritage system mapping in the proposed draft, and the information

shown on the appendices is not what was shared during the pre-consultation process described above. The data used in preparation of appendix 2 in the current submission is outdated and incorrect.

Specific Comments:

Settlement Area Boundaries:

Regarding Settlement Area Boundaries as proposed in the schedules, what type of consideration was given during their delineation and will there be triggers to ensure natural heritage features or environmentally sensitive areas will be considered and appropriately protected as new development is proposed in these areas?

Provincial Policy Statement (PPS):

Although this aspect is primarily MAH's mandate/business, we wanted to flag that several sections of the Draft refer to the old PPS (1997) and in several areas, the outdated policy wording is used (ex. Will or shall *have regard for*, as opposed to *shall be consistent with; development in Provincially Significant Wetlands*).

Endangered and Threatened Species:

There is no section that deals specifically and adequately with endangered and threatened species and their habitats. According to Section 9.0 Environmental Protection, intent is to apply policies to areas designated EP as per the Schedules. However, endangered and threatened species habitat is not delineated on the Schedules (nor should they as this information has sensitivities) and the incorrect areas are shown on the appendix 2. MNR's interpretation of the plan is that the appendices do not form part of the official plan. Given the wording in Section 9.4 '**council may require** a site-specific biological overview ... before new planning approvals are given...' and '**due consideration** shall be given ... ', and acknowledging that a very small proportion (ex. Less than 5 %?) of these sensitive habitats are currently known and mapped, and given the very strict standard in the current PPS (ie. No development in these areas) with respect to these habitats, MNR recommends that this policy should be more detailed. More detail would allow township staff/planners to know which sources of data to check, to ensure most current data is considered from the main sources, and that any site-specific biological overview or impact study(ies) are properly scoped. The policy should automatically apply to habitat features / locations that may be identified and shared with the Municipality in the future (ie. Without need for an OP amendment).

There are no specific EIS standards included in the draft OP. Although the Terms of Reference for an EIS to identify extent of habitat will differ by species, and mitigation measures in adjacent lands will be different as well. The District is willing to work with the Township staff, on an as need basis, to provide review of draft TOR for any necessary EIS (ie. To be prepared by consultants), as it relates to the *Endangered Species Act* and our role in 'approval of habitat' (PPS, 2005). We recommend that a general TOR be included in the Implementation and Interpretation section of the OP.

Significant Wildlife Habitat (SWH):

There appears to be no designation or specific policy (ies) for Significant Wildlife Habitat (SWH). The background documents compiled by the planning consultants in advance of the OP appear not to address this area of the PPS. MNR had provided NHS components draft mapping (based on best available data), including SWH components, to the Township during pre-consultation.

Although the correct Deer Wintering / Yard Areas are included in appendix 2, the policies fall short. How will proposals be screened against this habitat? We recommend that these habitats should be addressed either through designation as EP in the corresponding Schedules, or alternatively, as part of a more detailed / comprehensive general development policy (ie. Forest Habitat, SWH or similar). As pointed out during 'pre-consultation', the Deer Wintering /Yard Areas represent some of the most intact tracts of wooded areas in the municipality, primarily surrounded by agricultural and other more intensive land uses. These woodlands offer a variety of other benefits or services (ie. Private land forestry- as recognized by Council-, watershed functions, recreational opportunities, aesthetics, other ecosystem values). Policy in the OP should reference the other values and functions and should set out a clear process for ensuring development does not adversely impact these ecosystems, particularly since the municipality did not identify any Significant Woodlands as per PPS, 2005 Section 2.1.4 (b)).

The general extent of the alvar habitat (see enclosed Briefing Document), another component of the natural heritage system and example of SWH, provided to the Municipality is also not identified in the schedules nor the appendices. The MNR is concerned that alvar habitat is mentioned only once, very generally in the introduction to the Environmental Protection (EP) policies and it is not clear how applications will be processed within this area. We recommend that this habitat should be addressed by one of three approaches: a) designation as EP in the corresponding Schedules, b) through a more detailed / comprehensive general development policy as discussed in the above section (ie. Forest Habitat, SWH or similar) or c) through a special policy area or secondary plan. MNR is willing to work with MAH, the Township and County and their consultants to draft a general EIS TOR for addressing impacts to alvar habitat. Perhaps a smaller TOR could be drafted for small scale development (ie. Fewer than 3 lots) and a more comprehensive one for larger scale development (ie. Golf courses, industrial uses, subdivisions, other). We recommend that these TOR be included in the Interpretation and Implementation Section of the OP.

There are other habitats and species occurrences as described in the MNR's Input Package (ex. Other larger wetlands -evaluated and non-evaluated-, species of conservation concern, etc) that could be addressed under a general development policy such as Significant Wildlife Habitat.

We suggest that the current draft does not adequately address SWH components as directed by the PPS, 2005 and could lead to loss of some very unique SWH as a result of future land use decisions.

Provincially Significant Wetlands (PSW):

The four PSW's identified on Schedules are shown correctly. However, the document should mention that more PSW's may be present on the landscape, therefore once this information is provided to the Municipality by MNR, the associated PPS policies should automatically be applied, without amendments to the OP, its schedules and appendices.

The policy direction in the Environmental Protection section (page 28) is incorrect. Development shall not be permitted within PSW boundaries, regardless of results of any Environmental Impact Study (EIS). This policy is currently not consistent with the County of Renfrew Official Plan, and the PPS, 2005. Also, EIS shall be required by Council in support of applications within 120 m of PSW boundaries. We recommend that some level of detail be outlined in this policy or in the Interpretation section, describing general contents/TOR of an EIS (ie. Confirmation and on the ground delineation of the boundary of wetland communities in relation to proposal, assessment of (direct and indirect) impacts to key features and functions as per the wetland evaluation, identification and recommendation of specific mitigation measures (ie. Realistic planning tools to mitigate from impacts in the long term). MNR may be consulted, only with respect to the scope

and TOR for any PSW related EIS, regarding data or contents of the wetland evaluation, or regarding amendments to PSW boundaries (ie. in a technical capacity only).

Water and Fish Habitat:

Regarding the *General Water Setback* Provisions (ie. General 30 m water setback), given the lack of site alteration and vegetation alteration bylaws in the landscape, as well as general lack of capacity and or will by local municipalities to act on contraventions of their OP and ZB's, we recommend that the word 'generally' should be removed. Also the OP should include a statement that Council recognizes and intends to promote and protect the naturally vegetated shorelines/riparian areas /water setbacks, to prevent loss of the various biological, economic and aesthetic values they provide (ie. Native vegetation decreases erosion, increases slope stability, helps maintain healthy water quality in lakes, rivers and aquifers, increases privacy and property values).

Regarding *Stormwater Management*, it may be appropriate to reference the policy in both the general development policy and plan of subdivision development criteria. MNR would like to flag that there are very few examples of subdivision and or commercial development projects which have incorporated adequate stormwater management facilities to date in Renfrew County. Although the current draft OP sets out a standard for requiring level 1 (quantity management) treatment, we recommend that level 2 (water quality) treatment should also be required. The impacts of untreated/unmanaged stormwater implicate not only MOE's mandate, but also MNR's fisheries management, that of the Department of Fisheries and Oceans Canada, and MAH's (ie. Section 2.1, PPS 2005). We also recommend that some level of biological/ecological site assessment by a qualified consultant take place, and mitigation be incorporated into planning stormwater/retention facilities, prior to siting of ponds/facilities within or immediately adjacent to existing natural heritage features, sensitive areas and hazard lands. MNR does not permit on line ponds (ie. within existing streams/creeks). Is it appropriate for this section to reference the requirement for MOE approvals?

Foodplain Hazard:

A more clear definition section defining floodplain, floodway, floodfringe, floodline would be beneficial. Definitions should be consistent with those in the PPS, 2005.

Section 10.2.1, Floodplain development, eludes to the lack of floodplain mapping in certain areas of the Township and that 'these policies will apply'. However this section appears not to prohibit development in the floodplain where floodplain mapping and or flooding elevations are not currently available (ie. River/creek tributaries flowing into the Madawaska and Ottawa Rivers). The policies need to be clarified to ensure that development along the Madawaska R. and other waterbodies without floodplain mapping is consistent with the one zone approach (ie. No development at all within the floodplain).

The direction in items i) through vi) on page 34 is not appropriate. With the exception of the Ottawa River (where FDRP mapping is available), on all watercourses in the Municipality development must be prohibited in the floodplain. Along these watercourses, only when a qualified engineer has determined through a site specific report that a proposal is above and outside of the area affected by the 1:100 year flood, can development be approved by the Township. It is not appropriate to delineate the floodfringe on a site by site basis and allow fill for the purposes of floodproofing to elevate a building envelope within the floodplain.

Additionally, has Ontario Power Generation been contacted to verify that the 'flooding elevations' along the Madawaska R. referenced in items 1) and 2) on page 54 are still relevant? If OPG's water level records indicate that these elevations have been exceeded, it is not be appropriate to use these

elevations as the standard. Overall this section (page 54) lacks clarity in terms of what type of supporting study or survey is absolutely necessary and if all development applications must be accompanied by a study/survey.

Lastly, any required floodproofing should be consistent with natural resource management best practices and council should ensure that no negative impacts to natural heritage features and functions will result from placement of fill near the water body. The Laurentian Valley Official Plan, Section 2.2.17 subsection c is a good reference.

Other Hazards:

Only the introduction to the Natural Hazards policies references Karst or unstable bedrock. There is no policy in this draft. Recognizing that Karst mapping is not yet available from the province for use in municipal planning, and acknowledging that there are areas within the Township (ex. in vicinity of the limestone bluff/alvar near Braeside) that may present geotechnical constraints for future development, we recommend that karst and any other type of hazard (excluding floodplain, leda clays, steep slopes) be addressed through a general development policy criteria.

Mineral Aggregate Resources:

There is a lack of emphasis on the importance/value of the resource. The introduction to the Mineral Aggregate Section could emphasize the value of these resources to the township, future growth and development costs, etc). Reference should be made to current market demand and that there is already a shortage of unconsolidated material (ie. Fill sand and gravel) within the Municipality. This could negatively impact the costs associated with future municipal projects, growth and development. McNab has limestone bedrock deposits which are not common within the rest of Renfrew County; this is not recognized in the policies. The policy objectives fall short on the intent to limit sterilization of these valuable resources; only existing pits and quarries are 'protected'.

In comparison to Provincial mapping, some areas of Aggregate Resource (ie.deposits) have been removed (ie. Settlement Area Boundary near Glasgow Station (S. of Hwy 17) Lot 19 Con 7; and near severed lots along Golf Club Rd). In other areas the Aggregate Resource designation has remained even when large areas appear to be sterilized by way of existing lots of record and or residences. The Schedule should include only those deposits which have not already been sterilized by surrounding land uses, so as truly reflect the available resources for future extraction within the municipality. Why have bedrock deposits for the most part not been shown on the schedules? The MNR recommends that the municipality undertake a constraint mapping exercise to determine which deposits remain viable (based on readily available information).

We suggest that statements such as expansions of operations (ie. quarries, pits, concrete batching facilities) 'shall be strictly prohibited' ... 'in areas in close proximity to significant residential development' may not be appropriate. If an application is made under the *Aggregate Resources Act* and all applicable studies document no impacts to surrounding land uses, and if planning documents permit the use (ie. Designation and zoning) then this type of statement is not relevant. Also, how is 'significant residential development' defined?

It is concerning that the current draft of the policies does not permit concrete plants. These facilities are necessary for the future growth and expansion of settlement areas and road networks in the Municipality and southern portion of Renfrew County.

If only temporary asphalt plants associated with a wayside pit/quarry for specific township/county/MTO road projects are acceptable to the Municipality, where will its residents get asphalt to pave driveways, parking lots, etc?

The current draft of the policies directs the future Zoning Bylaw to zone mineral aggregate areas in a 'non development type zone'; we recommend that these areas be zoned to Extractive Industrial Reserve (EMR).

The polices could reference the Township's ability to protect / preserve topsoil through bylaw under the *Municipal Act*.

The policies should be clear that zoning bylaws amendments filed to process 'minor incursions' (ie. small areas designated mineral aggregate to be removed) must be carefully reviewed. Only minor portions of the designated areas, on the periphery of the designation (where materials may not be of prime quality) and within close proximity to sensitive land uses (where sterilized) should be adjusted. Studies to support this review will be required of the applicants. We recommend that a general TOR for such studies be included in the Interpretation and Implementation section of the OP.

Although the policies could include a statement that 'applications for pits/quarries below watertable shall be discouraged...' the *Aggregate Resource Act* process is a higher order process and overrides this policy.

In terms of discouraging incompatible land uses (ie. consideration of rezoning applications within influence areas of pits, quarries and deposits), the OP should state that the Township will require supporting studies to prevent further sterilization of aggregate deposits which could feasibly be extracted. MNR should not be consulted in this regard. Implementation of study results is a responsibility of the Municipality and County of Renfrew.

Regarding the policy requirement that all pit and quarry uses must satisfy requirements (relating to water) of the Ontario MOE and the Township, the *Aggregate Resources Act* already ensures that aggregate license applications are circulated to the various agencies (including MOE and Township). The MOE's permitting systems also allow for consultation to the same agencies.

It is not clear what the purpose/direction of the references to the Madawaska and Ottawa River floodplains is with respect to aggregates resources or their extraction/protection.

Lastly, there are several errors or discrepancies in the boundaries of the operations currently under license (ie. Existing pits and quarries). MNR will provide revised digital boundaries by the end of December (2006) for incorporation into the next draft of the schedules.

For further information or to meet to discuss the above comments in more detail, please contact Joanna Gaweda, District Planner, at (613) 732-5522 or by email at joanna.gaweda@ontario.ca.

Thank you,

E. Allan Hyde
Acting District Manager

Pembroke District
/jg

Encl.

Page(s) 000206 to\à 000206

Is(are) duplicate(s) of

est(sont) (des) duplicata(s) de

Page(s) 000226 to\à 000226

For internal use only

**BRAESIDE ALVAR:
BRIEFING ON A SWH COMPONENT WITHIN MCNAB TOWNSHIP**

1.0 Description of Braeside Alvar

The Braeside Alvar has a variety of characteristics that make it a unique feature in the Township and in Renfrew County. Alvars are discrete ecosystems of special biological diversity and conservation interest. They are rare in North America, Ontario and globally, occurring only near the Great Lakes (ex. in areas of south eastern Ontario such as Bruce Peninsula, and globally only in Scandinavia). Of the documented alvar habitats in North America, the Braeside Alvar is near the northern extent of alvars in the eastern portion of the Great Lakes basin (see Appendix 1- attached). This alvar is the most northerly example of alvar habitat associated with the Ottawa River with its own unique microclimate and adaptations.

The Alvar is associated with an ancient beach ridge, geologically different from the rest of the Township of McNab. It is a groundwater recharge area, contributing to the shallow and deep aquifer within this area of the Township (Renfrew County Groundwater Study, September 2003). It is a source of numerous coldwater springs situated around its perimeter and discharging to several stream systems. The alvar is open or treed in areas of thin soil over flat limestone, and is characterized by a mosaic of vegetation communities and plant species adapted to extreme environmental conditions throughout the year (very wet conditions to very hot and dry). Most of the vegetation communities associated with alvars in Ontario are considered rare in Ontario and throughout the world.

The quality or successional stage of the alvar habitat throughout its extent varies, with some areas relatively disturbed by various land uses (ie. Golf course, scattered residential and subdivision development, aggregate extraction, road networks, cattle grazing etc) and other areas still in tact.

2.0 Rationale for designation and special consideration

The key aspects or characteristics that make the Alvar unique and that would warrant its designation as Significant Wildlife Habitat(SWH) are:

- a) Contains populations of various species of conservation concern (ie. including S1-S4 ranked species, as well as some designated Species at Risk –See Appendix 2- enclosed);
- b) Contains vegetation communities of conservation concern, (assemblages of species) which are considered rare and extremely rare in Ontario (Natural Heritage Information Centre);
- c) Contains large core deer wintering habitat (SWH on its own). Winter deer habitat provides shelter and food for deer during the winter months and is critical to their survival in the area. Deer wintering habitat is characterized by dense, mature conifer forests, with ready access to young hardwood growth suitable for browsing. This habitat is very significant to the deer population because deer herds congregate and are confined within these forest stands, when they are most stressed and vulnerable. Also, the deer winter habitat generally represents the best quality forest habitat remaining in the Township.

- d) Has not been studied and unique features are being destroyed without confirmation of presence of these features and values. Because of private ownership there is very little access to assess its feature and function.

3.0 Site Specific Information

The MNR does not have access to aerial photography more recent than 1987, nor is there high resolution satellite imagery available for this area. Although MNR has provided general boundaries of the feature (see appendix 3 -attached), the presence/absence and quality of the alvar features needs confirmation on a case by case basis prior to development taking place. Although research on alvar habitats is scarce for Renfrew County sites, there has been some work done on Ontario alvars. Information sources such as the Federation of Ontario Naturalists' 'Alvars of Ontario (Brownell and Riley, 2000)' exist; the NHIC and select universities could be contacted for more information.

To date, site specific ecological information has been collected by consultants in relation to site specific *Aggregate Resources Act* and *Planning Act* applications for the expansion of the Braeside Quarry. MNR has had limited opportunity to collect information about the feature as it is primarily in private ownership. The portion of the Alvar in municipal ownership (ie. Contribution towards parkland or open space) and accessible has been disturbed (ie. Not in tact).

4.0 Potential Development Effects

Alteration of the following factors:

- Vegetation removal (ex. tree cutting, pedestrian traffic in areas with sensitive plants, deer thermal cover or ground structure changes, livestock grazing)
- Hydrologic changes (ex. long term disturbance of groundwater through water takings and discharge, drainage and road networks, clearing of largely dense vegetated areas)
- contamination of groundwater

5.0 Suggested Policy Approach

The following is MNR's District recommendation to MAH and the Township as one approach to addressing SWH components, including the Braeside Alvar, in the OP.

We recommend that Council ensure that the following are addressed in the OP:

- 1) Include a general policy recognizing the value of wildlife and supporting the protection of significant wildlife habitat, such as: "Council recognizes the importance and value of wildlife and supports the protection of significant wildlife habitat". Such a statement may be added to a section dealing with the overall objectives of the plan and could include a general statement about all environmentally sensitive areas.
- 2) Identify the general location of known habitat of species of conservation concern and other significant wildlife habitat on resource maps (ie. **As overlays to the Schedules**) and incorporate policy to **contact MNR for technical advice when development or site alteration occurs near these features**. An assessment by a qualified consultant may be

required and or conditions of development may need to be implemented in these areas. Also the OP should recognize that as habitat quality and wildlife use patterns change and new information/data is acquired, the mapping will be updated **without a need to amend the OP.**

- 3) Include a policy that generally requires applications to be supported by a **scoped site-specific assessment in areas identified to have potential to be significant wildlife habitat.** If significant wildlife values are found, in some instances more detailed assessment may be required and or conditions of development may need to be implemented. MNR may be contacted for technical advice regarding assessments and proposed mitigation measures.
- 4) Include a policy that generally requires **applicants to provide detailed/quality information** (photos, site plan) regarding natural heritage features during the application process.
- 5) Include a policy ensuring appropriate development controls to protect seasonal concentration areas, rare or specialized habitat, wildlife movement corridors, the habitat of species of conservation concern and species of special concern.
- 6) Include a policy that natural corridor linkages will generally be protected in order to maintain, restore and/ or improve the diversity and connectivity of natural features and the long-term ecological function and biodiversity of natural heritage systems.

We are of the opinion that these recommendations have not been incorporated in the current Draft OP to adequately address the SWH component of the PPS 2005 (Section 2.1.4), with respect to the Braeside Alvar in particular. It could be argued that the current draft is also not consistent with PPS Sections 2.1.1 and 2.1.2 and that a natural heritage system has not been identified/mapped or described in any detail. We would look for MAH support to ensure that a special policy is included in future Drafts of the OP.

6.0 Other Potential 'Provincial Concerns'

Through the pre-consultation meeting in support of the proposed expansion of the Braeside Quarry, it has come to our attention that the preliminary hydrogeological assessments of the aquifer below the alvar feature could be contaminated with bacteria. The existing land uses (ie. Residential, golf courses? etc) could be contributing. It is not clear whether the residential development and associated well location and drilling have been carried out in accordance with MOE's guidelines and best practices. It is clear that considerable residential development has taken place by way of severance on individual services, without hydrogeological assessments.

We recommend that it is important to approach MOE with the question 'is it appropriate to continue development by way of severance or subdivision on individual services,

which will lead to more 'raised septic systems' and more wells (potentially at risk). Is this a source water protection issue in the making?

7.0 Appendices

Appendix 1

See attached figure showing limestone plane bedrock areas where alvars can occur throughout Ontario (source: The Alvars of Ontario, by V R Brownell and John Riley, 2000).

Appendix 2

The following are Species (some of which are Species At Risk) which have been documented to exist within the Braeside Alvar:

Provincially Significant:

Ram's-head Orchid (*Cypridpedium arietinum*) S3/G3
Cooper's milk-vetch (*Astragalus neglectus*) S3
Giant Pinedrops (*Pterospora andromedea*) S2
Sporobolus heterolepis S3

Regionally Significant:

Amelanchier alnifolia var. compacta
Bromus kalmii
Carex richardsonii
Diphasiastrum complanatum
Juncus articulatus
Panicum flexile
Panicum philadelphicum
Scutellaria parvula
Solidago asteroides
Trichostema brachiatum
Veronica peregrine

Milksnake (Species of Conservation Concern) is documented to occur within the Braeside Alvar.
Butternut (Endangered) is documented to occur on steep slopes associated with this Alvar.

Note that there is very good potential for additional species of significant flora and/or fauna to be found with additional field work. Also note that some of the above species although are currently listed as of conservation concern/otherwise significant and PPS 2.1.3 a) endangered and threatened species would not apply, if a 'status report' were to be conducted by Environment Canada and Ontario, some of these species could possibly rank as endangered or threatened.
Source: Daryl Coulson, District Ecologist, Pembroke District

Appendix 3:

The general extent or boundary of the Braeside Alvar is attached digitally. Also, a map illustrating the location of the alvar among the other natural heritage system components in the Township is included in this package.