

## Malloy, Erin (MNR)

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**From:** Coulson, Daryl (MNR)  
**Sent:** April 17, 2008 3:39 PM  
**To:** Malloy, Erin (MNR)  
**Subject:** McNab - Braeside OP EnvProt Review

Hi Erin,

Here are my review comments:

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### Coulson Review Comments on McNab-Braeside OP Section 9.0 Environmental Protection

Pg 1, Subsection 9.1, para 1,  
last sentence – change to "...  
alvar soil conditions producing  
globally and provincially rare  
vegetation communities  
containing globally and  
provincially rare plants."

Pg 1, Subsection 9.1, 2<sup>nd</sup> para  
– Natural heritage features as  
listed appears consistent with  
PPS for most part, however  
they are not identified on  
Appendix A as stated. Different  
categories are on Appendix A  
and important features are not  
included at all. Significant  
Wildlife Habitat is not  
mentioned at all on Appendix  
A.

### Subsection 9.4 Environmental Protection Policies

Pg 2, Subsection 9.4 (3) – I am  
not sure what this is really  
saying, so I am unsure as to  
the implications to PPS natural  
heritage features. Loop-hole  
(s)?

Pg 2, Subsection 9.4 (5) –  
Suggest changing wording of  
second sentence to read  
something like: "As such, these  
areas contain features and  
values of biological, social,  
hydrological, and special  
feature significance that are  
considered environmentally

sensitive to development."

Pg 3-4, Subsection 9.4 (11) – Needs a line added similar to subsection 9.4 (5) dealing with PSW's, with wording such as, 'council shall require an Environmental Impact Study (EIS) regarding development adjacent to END and THR species habitat in accordance with Section 9.6 of this plan.' What about approach to new information? Shouldn't it be the same as for PSW's and potential alvar, having no need to update Appendix A without an amendment to the plan? Shouldn't the process be described? And that it is a requirement, a shall do, rather than a consideration by council.

Pg 4, Subsection 9.4 (11) – last line should read: "... within 50 metres of an identified habitat of threatened or endangered species." [assuming 50m is still ok. I heard that it was being changed to 120m]

now NHRM

Pg 4, Subsection 9.4 (12) – first line should read: "... soil conditions producing globally and provincially rare vegetation communities with globally and provincially rare plants."

Pg 4, Subsection 9.4 (12) – Needs a line added similar to subsection 9.4 (5) dealing with PSW's, with wording such as, 'council shall require an Environmental Impact Study (EIS) regarding development in areas of potential alvar habitat in accordance with Section 9.6 of this plan.'

Pg 5, Subsection 9.6 Environmental Impact Studies – This section should include some text mentioning the need to pre-consult with MNR on EIS's that pertain to PSW's, ANSI's, and habitat of END and THR species, and that a terms of reference for the EIS satisfactory to MNR may be

required.

Environmental Protection Policies are missing PPS requirement for 'Significant Wildlife Habitat'! Shouldn't there be policy text on this? Including a definition? Those areas of SWH provided by MNR to municipality almost 2 years ago are absent from the text and appendix A!?!?

Appendix A –

- a) Mississippi Valley Conservation Authority jurisdiction does not enter into McNab / Braeside. Map error.
- b) Significant Wildlife Habitat is missing! If a SWH is a component of "Sensitive Areas of Concern", then this needs to be clarified both in policy text and on the figure.
- c) Clay Bank Alvar has more definitive mapping available at 1:50,000 scale. It however is an approximation and interpretation based upon limited field work. Therefore, the existing generalization of this feature is considered sufficient to capture potential areas and properties of interest.
- d) 'Sensitive Areas of Concern' include MPR\_AOC's or splodges based upon old criteria, and thus includes some sites that would, using present standards, be excluded.
- e) 'Sensitive Areas of Concern' as presently shown are missing some very important SAR splodges that should be included. (As a concern on the side – the MPR\_file is missing some key SAR occurrences which should have

*MNR has identified = supplied values  
Site by Site consideration*

*— deer yard  
Plants + animals of  
~~these species~~ Conservation concern  
Waterfowl staging area*

been picked up using the  
BDB and MPR  
occurrence  
prescriptions used to  
create the MPR file.  
We need to investigate  
to figure out what went  
wrong and where to  
fix.)

- f) Braeside Alvar  
feature as shown on  
this draft Appendix  
map is missing some  
areas in the north,  
north-east and south  
(Sandy Hook area).  
What was rationale for  
excluding these as  
potential alvar? Was  
this the item we were  
going to discuss with  
municipal planning  
folks?

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