

Kannakko, Kris (MNR)

From: Coulson, Daryl (MNR)
Sent: October 9, 2007 11:38 AM
To: Gaweda, Joanna (MNR)
Cc: Punt, Kirby (MNR); Baker, Tania (MNR); Hyde, Al (MNR); Handford, Karen (MNR)
Subject: RE: miller EIS for Alvar

Here are my review comments on the preliminary EIS for the Braeside Quarry expansion.

Document reviewed: Natural Environment Assessment – Braeside Quarry Expansion Area (Brunton Consulting Services. April, 2007)

Much more secure commitment to long-term protection of alvar (Significant Wildlife Habitat – globally significant habitat) proposed for retention is to exclude this area from the ARA licence boundary AND change zoning, OR to transfer ownership of proposed protection area to a conservation organization. Otherwise...and I have seen it before...extraction is really only deferred. I know the licencing process has its traditional guidelines or approaches in terms of a licence boundary delineation but can we not improve the process somehow in order to address due consideration and protection of significant natural resource features such as the alvar?

Pg 3 & 16 – need to confirm that SARO species were also considered.

Pg 3 – 152 plant voucher specimens are mentioned. ID's for these?

Pg 15 – Milksnake SC is also known to occur on the alvar in the vicinity of the proposed quarry expansion.

Pg 25 Reference to and interpretation of PPS. Comparison of Fig 21 & 22 with Preliminary Site Plan shows significant exclusion of Brunton's protection zone in eastern section/area. Mapping error on Site Plan?

Fig 22 Recommended expansion of protected area = adjacent lands of PPS?

In conclusion, the preliminary Level 1 Natural Environment report has appropriately included the SWH and SAR features and values of the subject lands relative to my review perspective.

The proposed expansion of the quarry will result in the destruction of approximately 25ha (62 acres) of globally significant habitat. Correct me if I am wrong, but it appears that on the basis of the PPS and the lack of provincial authority in municipal planning matters, there is no strong basis (legislative or policy) for provincial objection to the proposed extraction of the alvar habitat. Under the PPS, the municipality has the responsibility and last word on SWH of which the alvar is feature (at least in my opinion). My preference would be to maintain the entire area identified in Figure 21 in order to "minimize the environmental impacts" (PPS) upon the significant alvar habitat. We can however be thankful that at this time, the proponent is recommending protection of almost half of this area – though its long-term protection is questionable because once a licence boundary is issued which includes the alvar, all that is required is an amendment to the site plan and it too will be gone.

Daryl

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From: Gaweda, Joanna (MNR)
Sent: Tuesday, October 09, 2007 9:19 AM
To: Coulson, Daryl (MNR)
Cc: Punt, Kirby (MNR); Baker, Tania (MNR); Hyde, Al (MNR)
Subject: miller EIS for Alvar
Importance: High

Hello!

Just a friendly reminder that we've committed in a meeting with Millers on Sept 11 that we would turn around comments on their preliminary EIS within 4 weeks. Daryl has the lead on the alvar issue, so if you happen to have the circulation, please return it to him, so we can finalize comments by Friday at the latest.

Thanks