

MNR Braeside Alvar Data

General Comments

To begin, much of this documentation is repetitive; much of it pertains to intra staff memos, often simply deciding how to respond to public enquiries. Even newspaper articles reporting on conflict at the M/B Council table are included. The data is chiefly in the 2006 - 2008 period, up until and including the time we requested the data. However, there are field notes on the alvar and listings of species considered important from an earlier period.

A great deal of this data pertains to the efforts of Joanna Gaweda, District Planner and Daryl Coulson, District Ecologist, to have this alvar designated in such a way that it would be protected. It is important to note that these efforts were started by MNR long before we became aware of the importance or even existence of the Braeside Alvar.

The Miller Expansion from pre-application consultations to the comments on their initial Environmental Impact Study to the final application is on file in a very haphazard, unorganized manner.

There was strong internal response to the public's telephone calls or letters. In departmental memos the Flag Status of the memos was Red, and Significance Rating, High.

It is quite evident from the documentation of correspondence amongst MNR employees and their input into the wording of the McNab/Braeside Official Plan that 1), this Braeside area is very important as an alvar and for its aggregate resource and 2), there are conflicting goals within the MNR for this area. To be specific, part of the organization clearly states that the importance of cheap aggregate overrides all other considerations, while the other part is determined to protect the significant globally rare alvar heritage.

Specific Concerns:

Nov. 24, 2006 - Joanna Gaweda to all MNR re. alvar : "If this feature is as rare in Pembroke District as I suspect, it might be considered for ANSI (Area of Natural and Scientific Interest) status."

In another handwritten, undated note it stated: this alvar is provincially/globally rare (NHIC), [Natural Heritage Information Centre], and should be at least an Environmentally Sensitive Area where very specific policy requirements would need to be met to approve future development.

Dec. 16, 2006 - Joanna Gaweda's handwritten notes: - asphalt plant Certificate of Approval could be amended to be permanent; SWH will be lost; older wells relying

on upper aquifer will be affected; redirection of flows in upper and lower aquifers need analysis; this location as a 'rural' receptor - noise, quiet at night etc.

Dec.19. 2006 *** Letter to Joe Gallivan, Planner OMMAH, Kingston from Paul Moreau re. MNR comments on M/B draft OP:

"We suggest that statements such as expansion of operations (quarries), 'shall be strictly prohibited ...in areas in close proximity to residential development' may not be appropriate.....Also, how is 'significant residential development' defined? (This is the undefined wording we have been fighting for years for just this reason!)

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

***Quarrying below the water table as they plan, will affect many, many of us.

Oct. 9, 2007 - Joanna Gaweda indicates MNR's preference to have the sensitive alvar area on the Miller property to be kept in a protective zoning OUTSIDE the new licensed boundary.

Oct. 9, 2007 - Daryl Coulson says ' ...long term protection is questionable because once a licensed boundary is issued which includes the alvar - all that is required is an amendment to the site plan and it too will be gone.'

*** He also states: "Expansion will result in the destruction of 62 acres of globally significant habitat. On the basis of the PPS, the municipality has the last word on the Significant Wildlife Habitat because of the lack of provincial authority on planning matters."

Apr. 17, 2008 - Daryl Coulson in his review comments on the M/B Official Plan Draft: 'Those areas of SWH provided by MNR to the municipality almost two years ago are absent from the text and Appendix A !!?!' He also points out that 'The Braeside Alvar feature is missing areas in the north, northeast and south. What is the rationale for this?'

Summary:

MNR is concerned about alvar protection, karst hazards, water loss and contamination and aggregate development. These concerns are not compatible. Alvar protection seems the strongest chance of controlling aggregate expansion.