

565 WESLEY ACRES ROAD | COMMENTS & RESPONSE MATRIX
 (PRINCE EDWARD COUNTY) FILE NO. Z9-24
 CAMPFIRE CIRCLE.



No.	COMMENTS	RESPONSE	CONSULTANT RESPONSIBLE	ADDRESSED (Y/N)
1.0	The Corporation of the County of Prince Edward - Planning Department			
	Comments on Appendix B, Proposed Zoning By-law Amendment			
	Matt Coffey - Planning Coordinator, Approvals - August 6, 2024			
General				
1.1	PJR must address Environmental Policies of OP. Overlay Area F on Schedule B (South Bloomfield Area). How will the Interim Control By-law be addressed?	While Schedule B, Overlay Area F (South Bloomfield Area) is not publicly available on the County's website, it is understood by the project team that this schedule indicates that the site is subject to Interim Control By-law Z7-23. The Interim Control By-law Z7-23 was initiated by the municipality, affecting various locations within Prince Edward County, and seeks to give the municipality time to conduct a review of areas where the shoreland designation overlaps with natural heritage features. The review is currently undergoing public circulation. Should the interim control by-law not be lifted before the end of its legislative period, May 2025, the project team may seek an exception for the subject site to be removed from the Interim Control By-law, provided all technical matters are resolved to the satisfaction of the County. As extensive field work has been completed on the site by professional ecologists, the natural heritage boundary has been clearly identified, thereby resolving conflict between the shorelands designation and environmental features on the site. The proposed development respects the findings of the ecological impact study and has been thoughtfully designed to minimize and mitigate any impact on the ecological function of the surrounding natural heritage features.	FOTENN	
1.2	The TC zone permits a range of uses that are not appropriate. Permitted uses should be defined in the special zone.	The proposed zoning by-law text has been updated to exclude uses permitted as of right in the TC Zone which are not appropriate for the site.	FOTENN	
1.3	Please revise the zoning by-law text.	The proposed zoning by-law text has been updated accordingly. Per the zoning by-law, the summer camp use would be evaluated as a "Other Commercial Use", requiring a minimum parking ratio of 1 space per 33 square metres of gross floor area. This would result in a minimum parking requirement of approximately 437 spaces. The intention of the proposed provision is to permit a reduction in the required parking on the site. Therefore, the revised zoning by-law text proposes to remove the minimum parking requirement and introduce a maximum parking requirement to ensure that there is not an oversupply of parking on the site. In this manner, parking may be provided in a manner which meets the operational needs of the camp, while also providing assurance to the County that there is an upper limit to the number of parking spaces being proposed. It is noted that the parking count shown on the concept plan has been based on the owner's extensive experience operating summer camps of this nature, which require a surplus of parking to accommodate high traffic volumes, including oversized vehicles, on pick-up and drop-off days, but will be largely vacant most days. Further, the accessory seasonal stable permitted in the zoning by-law text is exempt from a Minimum Distance Study as no livestock will not be housed on-site.	FOTENN	
1.4	See staff mark ups and revise concept plan accordingly.	Concept amended to address concerns	THA	
Appendix B - Proposed Zoning By-Law Amendment - Campfire Circle - 565 Wesley Acres Road				
1.5	iii. Minimum Parking Requirement: 300 spaces - "Why so many?"	Staff and Volunteers are 250+/- and leaves room for visitors and was based on similar camp uses.	THA	

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1.6	iv. In addition to the uses permitted in the TC Zone "Not all uses appropriate for site." a swimming pool and seasonal stable "Does this creat MDS issues" shall be permitted a accessory uses to a permitted Tourist Commercial use.	Seasonal use only not full year round facilities	THA	
1.7	v. Shade structures shall be permitted on docks / decks within 15 metres of the regulatory flood plain. "Subject to QC approval."	Shade structure is there to assist with the sensitivity of the campers to sunshine due to radiation treatment. Final dock design and placement is yet to be finalized and only conceptual. All necessary approvals will be addressed through appropriate approval agencies.	THA	
1.8	Schedule 1 "Is there a Schedule 1"	The proposed zoning by-law text has been updated accordingly.	FOTENN	
Comments on Site Plan				
1.9	Zoning Stats	Zoning Table was included on the 2nd page but a summary will be added to the Site Plan	THA	
1.10	[Off-grid cabin] Size?	Refer to attached - propose 100sm	THA	
1.11	[Campsites] Size, provide typical site layout	Refer to attached - propose 3m x 3m platform fit around trees	THA	
1.12	[Left of Vehicle Turning Circle] Snow storage area	Snow storage added	THA	
1.13	[Above High Ropes] Pathway	Pathway connection to high ropes added	THA	
1.14	[Centre of Vehicle Turning Circle] Landscaping?	Landscaping to be added to turning circle	THA	
1.15	[Parking lot] Too much parking, parking space sizes should be reduced	Will be adjusted to suit current parking stall size identified in typical ZBL standards.	THA	
1.16	[Flexible Residence (Flex)] Is this an overflow? [Empty space] Circle, ?	Flex staff is intended for staff/visitors who may only be there for a short period of time and not a full session as well as for more senior leadership potentially including families	THA	
1.17	[Dead end road] Road width?	6m - dimension added to drawings	THA	
1.18	[Entrance Road] Commercial standard.	Will be revised to satisfy commercial standard and traffic consultant concerns	THA	
1.19	[Intersection] Eliminate Road, Shift Parking into this area to meet CA setbacks	Existing roadway maintained for deliveries and parking relocated - refer to attached.	THA	
1.20	[Maintenance] Size? Is size adequate?	Layout review and size adjust to suit	THA	
1.21	[New pond] Road traverses through pond, please revise.	Pond removed as per attached	THA	
1.22	[Stables] MDS 2#	Seasonal use for maintaining horses on site only	THA	
1.23	[Stable Court] Is there a riding area? Is this an arena?	Open air roof for riding area - refer to attached	THA	
1.24	[Hospital] Hospital Details	More of a clinic to maintain ongoing treatments for campers who are currently stable in their health. Any complex / infections or declining health will be sent off site for treatment.	THA	
1.25	[Indoor Activity] Is this a indoor gym?	See CPM notes	THA	
1.26	[Property line on lower right] Property line encroachment	Site configuratin revised to suit - refer to attached	THA	
1.27	[Boad Launch Access] Parking area?	Boats to use the launch on a seasonal basis - minimum in and out. Turn around is also intended for emergency vehicle turnaround. Layout revised to 3-point turn to minimize impact to site.	THA	

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1.28	[Pool Bldg] Details, size, washrooms? change rooms? Equipment?	Pool change rooms/washrooms/showers and necessary mechanical/ electrical as well as administration and storage spaces.	THA	
1.29	[X in circle] What is this? Where does this walkway go? Is it intended?	This is a barrier free pathway that needs to switch back to navigate the topography. The circular portion of the path is there to provide a rest area as needed as well as a landing to start the next slope.	THA	
1.30	[Canoe / Kayak access] Is this needed? Use boat launch? Canoe kayak storage?	Canoes and Kayaks to be stored on free standing racks close to the water sufficient to service a limited number of users.	THA	
1.31	[R-18000] Why so big? Is bulb needed?	Revised to minimize driveway	THA	
1.32	[Lodge] Provide some detail. Kitchen & dining? Common area? Reception?	This is the main dining hall c/w kitchen and washrooms. Lower level to have craft type spaces and supporting service spaces for the building.	THA	
1.33	[High Ropes] Is this a park?	Currently a place holder to be designed down the road and carefully fit within existing slopes and tree canopies and orientation.	THA	
1.34	[100-year flood elevation] Delineate	100 year flood plain extent delineated - refer to attached.	THA	
1.35	[Site Plan] Concept Plan	Refer to attached.	THA	
1.36	[Loop near flagpole field] Need turnaround area	Deliveries have a designated roadway to avoid any conflict with pedestrian traffic. Turn around added - refer to attached.	THA	
2.0	Conservation Authority Comments			
	JULY 12, 2024 PAUL MCCOY, PLANNING & REGULATIONS MANAGER 			
	Rezoning Application - Campfire Circle - 565 Wesley Acres Road			
2.1	The staff of the Conservation Authority has reviewed the subject application, the Planning Justification Report by Fotenn dated April 29, 2024, the Natural Heritage Impact Assessment by Ecological Services dated April 28, 2024, the Functional Services Report by Jewell Engineering dated April 29, 2024 and drawings A011 rev. 2 dated April 16, 2024, A013 to A018 rev. 1 dated March 1, 2024 by THA. Staff completed this review with respect to the applicability of Ontario Regulation 41/24 (Prohibited Activities, Exemptions and Permits), the Quinte Source Protection Plan, stormwater management and the natural hazard components of the Provincial Policy Statement. We would like to offer the following comments:	Acknowledged	FOTENN	
	Zoning By-Law Amendment			
2.2	The subject lands are currently split-zoned Rural 2 (RU2) and Environmental Protection - Provincially Significant Wetland (EP-W) within the County of Prince Edward Comprehensive Zoning By-law No. 1816-2006, as amended. The Zoning By-law Amendment application proposes to rezone the subject lands to a Special Tourist Commercial (TC-X) Zone. It is also understood that the boundary of the EP-W Zone will be amended in accordance with the field work completed through the Natural Heritage Impact Assessment (Environmental Statement) prepared by Ecological Services, dated April 28, 2024.	Acknowledged	FOTENN	
2.3	Site specific provisions relating to the TC-X Zone pertain to minimum lot frontage (stated as 9m within the draft wording of the zoning by-law amendment, but also stated as 12m within Planning Justification Report, maximum height of buildings (proposed 12m), and minimum parking requirement (proposed 300 spaces). In addition to the uses permitted within the TC Zone, provisions will allow for a swimming pool and seasonal stable to be permitted, as well as shade structures (roof only) to be permitted on docks/decks within 15 metres of the regulatory floodplain.	Acknowledged	FOTENN	

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2.4	<p>Quinte Conservation has no concerns regarding the allowance of the proposed 300 parking spaces as a provision within the TC-X Zone; however, the location of the proposed parking lot does not meet Quinte Conservation's 30 metre setback from the PSW. The 30m wetland setback is illustrated on the drawings but the parking lot has been illustrated as encroaching into the setback and right up to the edge of the PSW boundary. Similarly, staff have no concerns with the incorporation of the swimming pool as permitted use within the TC-X Zone, but staff do have concerns with the location of the proposed pool. The pool would be required to meet a minimum 6 metre setback from the erosion hazard and floodplain of West lake and a minimum 15 metres from the PSW boundary (whichever of these measurements is greater). Provided docks/decks are temporary/removable, staff are not concerned about allowing for shade structures within 15 metres of the regulatory floodplain as per the provision of the zoning amendment.</p>	<p>ES: The proposed location of the pool is currently occupied by mowed lawn and seasonal buildings (see attached pictures). From an ecological perspective, mowed lawn does not have a high ecological value or provide significant ecological contributions. A mowed lawn can provide some stormwater amelioration, but presumably this can be matched by site controls, and this would be something that the stormwater engineering would need to show is possible.</p> <p>THA: Parking location and layout revised to respect 100 year flood plain and PSW setback. Refer to attached.</p>	<p>ECOLOGICAL SERVICES</p>	
	Stormwater Management			
2.5	<p>As per O. Reg. 596/22 this office no longer provides comments on water <u>quality</u> as part of our stormwater management review. Municipalities must continue to follow the Ministry of the Environment <u>Stormwater Management Planning and Design Manual March 2003</u> for stormwater quality requirements. Staff will continue to provide comments on stormwater <u>quantity</u>.</p>	Acknowledged	<p>FOTENN</p>	
2.6	<p>The submitted servicing report is written at a high level with preliminary discussion of design criteria. Quinte Conservation concurs with the conclusions of the report. There is no stormwater design submitted for review. The design criteria for the future stormwater management design, are safe conveyances of stormwater flows (no quantity controls or retention required), and enhanced quality treatment.</p>	Acknowledged	<p>FOTENN</p>	
	Quinte Source Protection Plan	Acknowledged	<p>FOTENN</p>	
2.7	<p>The subject property is not located within a Municipal Drinking Water Intake Protection Zone. Source Protection staff have no concerns with this aspect of the proposed development.</p>	Acknowledged	<p>FOTENN</p>	
	<p>Natural Heritage Impact Assessment: As per O. Reg. 596/22 this office no longer provides comments on the natural heritage components of applications submitted under the Planning Act. However, staff still review environmental impact studies from a natural hazard perspective. Staff have the following comments:</p>	Acknowledged	<p>FOTENN</p>	
2.8	<p>Although staff did not perform a detailed inspection, staff concur with the wetland boundaries as illustrated in the Natural Heritage Impact Assessment.</p>	Acknowledged	<p>FOTENN</p>	
2.9	<p>The proposed parking lot is located adjacent to the PSW. The parking lot must meet QC's general development setback which is the greater of the following: 15m from the 100 year floodplain, 6m from the erosion hazard limit or 30m from the wetland boundary.</p>	<p>ES: The proposed location of the turnaround is currently occupied by mowed lawn (see attached picture). From an ecological perspective, mowed lawn does not have a high ecological value or provide significant ecological contributions. A mowed lawn can provide some stormwater amelioration, but presumably this can be matched by site controls, and this would be something that the stormwater engineering would need to show is possible.</p> <p>F: Please refer to the updated concept plan. The proposed parking lot has been relocated to provide a 30-metre buffer from the wetland boundary.</p> <p>THA: Parking location and layout revised to respect 100 year flood plain and PSW setback. Refer to attached.</p>	<p>ECOLOGICAL SERVICES / FOTENN / THA</p>	

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2.10	The proposed campitheatre is located within 30m of the lake. This structure must meet QC's general development setback which is the greater of the following: 15m from the 100 year floodplain, 6m from the erosion hazard limit or 30m from the wetland boundary.	<p>ES: The proposed location of the turnaround is currently occupied by mowed lawn (see attached picture). From an ecological perspective, mowed lawn does not have a high ecological value or provide significant ecological contributions. A mowed lawn can provide some stormwater amelioration, but presumably this can be matched by site controls, and this would be something that the stormwater engineering would need to show is possible.</p> <p>F: Please refer to the updated concept plan. The proposed campitheater has been relocated to provide a 15-metre setback from the 100-year flood line and a 6-metre setback from the erosion hazard limit.</p> <p>THA: Campitheatre location and layout revised to respect 100 year flood plain and PSW setback. Refer to attached.</p>	ECOLOGICAL SERVICES / FOTENN / THA	
2.11	The proposed swimming pool and splashpad is located within 30m of the lake. QC's setbacks for this proposal is subtly different from above; A swimming pool must be located at a minimum of 6m from 100 year floodplain and erosion hazard and 15m from wetland boundary whichever is greater.	<p>ES: The proposed location of the turnaround is currently occupied by mowed lawn (see attached picture). From an ecological perspective, mowed lawn does not have a high ecological value or provide significant ecological contributions. A mowed lawn can provide some stormwater amelioration, but presumably this can be matched by site controls, and this would be something that the stormwater engineering would need to show is possible.</p> <p>F: Please refer to the updated concept plan. The proposed pool and splash pad have been relocated to provide a 15-metre setback from the 100-year flood line and a 6-metre setback from the erosion hazard limit.</p> <p>THA: Pool location and layout revised to respect 100 year flood plain and PSW setback. Refer to attached.</p>	ECOLOGICAL SERVICES / FOTENN / THA	
2.12	A wheelchair accessible boardwalk/pathway is proposed within 15m of the lake. QC's setbacks are less restrictive for boardwalks / pathways. At this point staff are recommending that at minimum that it be located outside the 100 year floodplain of the lake. However, a 15m setback from the floodplain is recommended to ensure that it is not damaged by waves.	<p>ES: The proposed location of the turnaround is currently occupied by mowed lawn (see attached picture). From an ecological perspective, mowed lawn does not have a high ecological value or provide significant ecological contributions. A mowed lawn can provide some stormwater amelioration, but presumably this can be matched by site controls, and this would be something that the stormwater engineering would need to show is possible.</p> <p>F: Please refer to the updated concept plan. The pathway has been relocated outside of the 100-year flood line</p> <p>THA: Walkway location and layout revised to respect 100 year flood plain and PSW setback. Refer to attached.</p>	ECOLOGICAL SERVICES / FOTENN / THA	
2.13	<p>Ontario Regulation 41/24</p> <p>The proposed development is located in an area subject to O. Reg. 41/24 (Prohibited Activities, Exemptions and Permits). A permit from this office will be required for all development (construction and site grading) within 30m of the wetland and floodplain and 15 from the erosion hazard (whichever is greater). Staff have the following comments regarding the drawings included with this submission:</p>	Acknowledged	FOTENN	

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2.14	The drawings depict an erosion hazard setback of 10m from floodplain. The consultant must use the erosion hazard as per the Quinte Conservation Shoreline Management Plan, June 21, 2022 and the minimum 6 m setback associated with this hazard.	Acknowledged	FOTENN	
2.15	The 100 year flood plain and associated 15m setback should be illustrated on all portions of the property. The snow storage area is within the floodplain.	Plan has been updated	THA	
2.16	The drawings label the 100 year flood elevation as 72.02 (ensure CGVD28) which is correct. However, the line does not appear to agree with the contours on the drawings.	Plan has been updated	THA	
2.17	Safe access has been demonstrated on Dwg A013 where existing road traverses wetland/flood plain near road frontage. The elevation of the road at a minimum here is noted as 76.03m	Plan has been updated	THA	
2.18	The vehicle turnaround within the floodplain and 15m setback.	<p>F: Please refer to the updated concept plan. The emergency vehicle turnaround has been minimized to reduce the amount of surface change within the 30-metre setback from the shoreline. The access cannot be moved outside of the setback from the 100-year flood elevation as it provides access to the waterfront for emergency vehicles. Use of the access will be restricted to emergency vehicles and camp maintenance vehicles, which will require access to the floating dock for seasonal installation and removal (totaling twice a year).</p> <p>THA: Turn around minimized but is necessary for emergency vehicles at the waterfront. Use of this access will be very infrequent.</p>	FOTENN / THA	
2.19	The campitheatre is within 15m setback of the floodplain.	<p>F: Please refer to the updated concept plan. The proposed campitheatre has been relocated to provide a 15-metre setback from the 100-year flood line and a 6-metre setback from the erosion hazard limit.</p> <p>THA: Position revised - refer to attached</p>	FOTENN / THA	
2.20	Staff cannot issue permits for new permanent docks. Staff are assuming that the docks and fishing shelters showing on the docks are floating and removed seasonally.	Noted. The docks and shelters showing on the concept plan are floating and will be removed seasonally.	FOTENN / THA	
2.21	Staff are concerned that the proposed wheelchair accessible boardwalk/path is within the 15m setback/waveuprush of the floodplain.	<p>FS: Please refer to the updated concept plan. The pathway has been relocated outside of the 100-year flood line.</p> <p>THA: Position modified to be outside the 100 year storm boundary</p>	FOTENN / THA	
2.22	The very large parking lot is located directly adjacent to PSW. The parking lot must meet our general development setback which is the greater of the following: 15m from the 100 year floodplain, 6m from the erosion hazard limit or 30m from the wetland boundary.	<p>F: Please refer to the updated concept plan. The proposed parking lot has been relocated to provide a 30-metre buffer from the wetland boundary. It is also noted that the parking lot is anticipated to be vacant most of the week, with the size dictated to accommodate an influx in use on pick-up/drop-off days and for occasional special events.</p> <p>THA: Position revised - refer to attached</p>	FOTENN / THA	
2.23	Staff are assuming that the entrance road will be improved/widened which may affect the wetland on each side. There is no discussion/compensation regarding this issue	<p>F: No alterations are anticipated to the existing driveway as part of this application. The driveway has been evaluated and appears structurally sound. The narrow entrance will serve as a traffic calming measure and is not anticipated to impact the functionality of the site.</p> <p>THA: Compensation to be proposed through ecologist</p>	FOTENN / THA	
2.24	There appears to be other structures near the entrance that do not meet QC's general development setback.	<p>F: Please refer to the updated concept plan. All structures are located outside of the 30-metre setback from the wetland.</p> <p>THA: Entrance to property to be revised to commercial standard.</p>	FOTENN / THA	

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2.25	The drawings illustrate a 30-metre setback measured from HWM/ Staff are not sure I this HWM represents the wetland boundary as well.	F: Correct, across the site, the 30-metre setback indicated on the concept plan has been measured from the wetland boundary. THA: Our understanding is that this represents both in review withg our ecologist.	FOTENN / THA	
3.0	ALDERVILLE FIRST NATION COMMENTS			
	OCTOBER 23, 024 JULIE KAPRYKA, CONSULTANT MANAGER ALDERVILLE FIRST NATION			
	Rezoning Application - Campfire Circle - 565 Wesley Acres Road			
3.1	What is the water intake plan?	Domestic water intake will be private drilled well on site. Fire water intake will be via a shore well. Refer to Functional Servicing Report (FSR).	JEWELL / GROUNDWORK	
3.2	What is the waste/sewage management plan?	Sewage will be managed by on-site private advanced treatment systems and effluent dispersal beds. Refer to FSR.	JEWELL / GROUNDWORK	
3.3	Will septic beds be appropriately designed/located to prevent runoff into nearby waterbodies/wetlands?	Effluent dispersal beds are positioned away from waterbodies and wetlands. Nitrate and Phosphorus removal will be required in the advanced treatment system. Refer to FSR for requirements. Detailed design to follow at Site Plan Approval stage.	JEWELL / GROUNDWORK	
3.4	How will stormwater be managed? Will there be a pond?	Stormwater quality will be managed via Best Management Practices reflecting Low Impact Design guidelines. Rain Gardens, Enhanced Grassed Swales, and Vegetated Filter Strips will be used in accordance with MOECC guidelines. Refer to FSR for management strategy. Full SWM Report to follow at Site Plan Approval stage.	JEWELL / GROUNDWORK	
3.5	There are growing concerns about salt management adjacent to waterbodies. Julie recommended looking into native plants that will actually absorb salt runoff adjacent to roads to help as a mitigation measure.	Stormwater managemenet strategies proposed promote infiltration which reduces salt runoff into adjacent waterbodies.	JEWELL / GROUNDWORK	
3.6	What permits are going to be required?	The full suite of permits required are not known at this time.	COPE GROUP INC.	
3.7	Why is an ECA required?	Secton 53 of the Ontario Water Resources Act requires an ECA for private sewage works with a design capacity greater than 10,000 litres per day.	JEWELL / GROUNDWORK	
3.8	Will there be any in-water works?	Currently dock design has not been finalized and is assumed not permanent. Should permanent docks be required for accessibility purposes, we will seek approvals from the necessary regulatory authorities.	COPE GROUP INC.	
3.9	What public consultation has taken place so far?	Several meetings with Planning Department and Quinte Conservation. A Public Information Centre (PIC) has been planned for 08-DEC-2024.	COPE GROUP INC.	
4.0	EAC WORKING GROUP COMMENTS			
	JULY 19, 2024 JOHN HIRSCH [Ward 9 Councillor] AND ANGUS ROSS FOR THE EAC PLANNING WORKING GROUP			

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4.1	<p>Our first, and perhaps overarching comment is that this application is premature and should not be considered at this time because the property lies squarely in the South Bloomfield Natural Core Area as identified in Schedule B of the 2021 Official Plan. As such, the property is subject to the Interim Control Bylaw which currently governs properties where Natural Core Areas and Shoreland designation intersect. That bylaw will be in place until May 22, 2025. None of the proposal documents recognize the fact of the property being in the Natural core Area.</p>	<p>As identified in the planning justification report, Schedule A-3 of the Official Plan does identify parts of the site and the surrounding waterbody as being designated "Environmental Protection", which includes PSW's and SCW's, as well as areas of natural and scientific interest. Schedule B further refines the mapping and identifies the water area as a SCW and part of the South Bloomfield Area Natural Core Area. Section 4.4.3.2(3) of the OP acknowledges that the boundaries of PSW's and SCW's are generalized and their limits are to be determined through the preparation of an EIS, in consultation with the QCA. The Environmental Impact Statement identified the boundaries of the provincially significant wetland through ground truthing. As such, the boundaries of the Environmental Protection Area designation on Schedule 'A' and the boundaries on Schedule 'B' are proposed to be refined without amendment to the Official Plan (as per Section 4.4.3.2.2 of the OP), to reflect the confirmed boundaries. No development is proposed within the identified boundaries of the natural heritage feature, with the possible exception of a floating dock, which will be subject to permits from the Conservation Authority. The intention of the Interim Control By-law was to give the municipality time to review properties where Natural Core Areas and Shoreland designation intersect. Given the ecological field work that has been conducted on the site, and the professional assessment regarding the proposed development, the project team will be seeking an exemption from the interim control by-law.</p>	<p>FOTENN</p>	
4.2	<p>It is our view that the ecological features and vulnerabilities of this property strongly outweigh its potential use as Shoreland and that it should most likely have the Shoreland designation removed when the ICBL expires.</p>	<p>Per the Draft Interim Control By-law Schedules provided on the Prince Edward County website, the subject site is provisionally identified as maintaining the Shoreland designation. The project team has been in touch with the Policy Coordinator overseeing the interim control by-law and will continue to monitor ongoing public consultation relating to this item.</p>	<p>FOTENN</p>	
4.3	<p>There is no indication at all of the time spent doing the reviews for endangered/threatened species. In an area of prime Blanding's habitat I am surprised that they only found traces of 1. See the comments of PECFN's Amy Bodman below</p>	<p>On page 20 of the EIS, we reference the following: <i>MNRF, Ministry of Natural Resources and Forestry. 2015c. Survey Protocol for Blanding's Turtle (Emydoidea blandingii) in Ontario. Species Conservation Policy Branch. Peterborough, Ontario. ii + 16 pp.</i> and that we followed the protocol therein. The protocol requires at least 5 survey dates during the nesting period which runs from Late May to Late June, and we conducted 10 visits. We also always look for evidence of turtle use during all surveys. Since the completion of the field work, we have been back to the site in 2023 and 2024.</p>	<p>ECOLOGICAL SERVICES</p>	

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4.4	Throughout the report the authors are reliant on the work to be proposed/carried out by others with no comments on absolute requirements. For example “The management and assessment of septic and stormwater development are not covered in any detail in this report, and instead will be provided by Jewell Engineering, and it is assumed that this will be dealt with to the satisfaction of the relevant agencies”	A Natural Heritage EIS focuses on the natural heritage features outlined in the Official Plan. As ecologists our role is to identify whether significant natural heritage features are present, and if present, will they be at risk of a negative impact, and whether mitigation or compensation can ameliorate that negative impact. We have no groundwater or septic expertise and therefore it would be unprofessional of us to assess these in our reports. Indeed, we have been told in the past by more than one Conservation Authority and the MECP not to do so. Having said that, we are aware that SWM is held to certain standards by the MECP, and it will be up to the applicants to meet those standards.	ECOLOGICAL SERVICES	
4.5	An assumption that septic and SWM will be covered by others is not satisfactory – they are not looking at environmental issues which this report is supposed to cover.	Please see above response to comment 4.4.	ECOLOGICAL SERVICES	
4.6	The EIS is full of "weasel" words in recommendations :ought to, should, instead of saying what must be done. Will any of their suggested precautions take place? Who in The County planning dept will follow up once work is started?	ES: This appears to be a comment on writing style, rather than questions about biology. If there was a specific point in the EIS that requires clarification, we would be happy to do so. F: Fotenn application subject to site plan control.	ECOLOGICAL SERVICES / FOTENN	
PECFN Comments on the EIS for 565 Wesley Acres Road				
	Preliminary Comments			

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4.7	<p>Select members of PECFN have reviewed a number of documents associated with this application. Although we certainly understand the need for such a facility for children with cancer and their families, we have concluded that this is not an appropriate location for such a facility. We are wondering what has happened to the Trillium facility located on West Lake in Wellington. Could it not be redeveloped to fulfill the same role? Presumably the Wellington site is already zoned for such use.</p>	<p>The site has been examined in detail as a potential camp location. It was deemed not to be suitable due to significant archaeological, hazard, and zoning constraints.</p>	<p align="center">FOTENN</p>	
4.8	<p>It is important to point out at the outset of these comments that this development proposal is located in one of the County's Natural Core Areas – specifically Natural Core Area “F”, South Bloomfield Area. The proponents fails to mention in its project documentation that their proposal is in a Natural Core Area. The PEC Official Plan does not permit major development in Natural Core Areas. In this regard, the OP states as follows: Major Development (commercial or industrial) outside of settlement areas and which requires an Official Plan Amendment will not be permitted (Section 4.5.4) In the “Definitions” section of the OP “Major Development” is defined as: Development that is a proposal with a proposed impervious area greater than 500 square metres or has an environmental footprint (eg. the total footprint including parking lots, driveways, building and structures, underground infrastructure, laneways and sidewalks, loading areas, septic systems, etc.) of greater than 0.4 hectares (1 acre) requiring any of: (a) an Official Plan amendment (b) a Zoning By-law amendment (c) a Plan of Subdivision/Condominium; or (d) A site plan control application(s).</p>	<p>As identified in the planning justification report, Schedule A-3 of the Official Plan does identify parts of the site and the surrounding waterbody as being designated "Environmental Protection", which includes PSW's and SCW's, as well as areas of natural and scientific interest. Schedule B further refines the mapping and identifies the water area as a SCW and part of the South Bloomfield Area Natural Core Area. Section 4.4.3.2(3) of the OP acknowledges that the boundaries of PSW's and SCW's are generalized and their limits are to be determined through the preparation of an EIS, in consultation with the QCA. The Environmental Impact Statement identified the boundaries of the provincially significant wetland through ground truthing. As such, the boundaries of the Environmental Protection Area designation on Schedule 'A' and the boundaries on Schedule 'B' are proposed to be refined without amendment to the Official Plan (as per Section 4.4.3.2.2 of the OP), to reflect the confirmed boundaries. No development is proposed within the identified boundaries of the natural heritage feature. The intention of the Interim Control By-law was to give the municipality time to review properties where Natural Core Areas and Shoreland designation intersect. Given the ecological field work that has been conducted on the site, and the professional assessment regarding the proposed development, the project team will be seeking an exemption from the interim control by-law once all technical comments have been resolved to the satisfaction of the County.</p>	<p align="center">FOTENN</p>	
4.10	<p>We also note that the definition of “Adjacent Lands” in the Official Plan is 120 m from any significant wetland and significant coastal wetland (Section 5.3 (b)). For the purposes of natural heritage, adjacent lands “are those lands contiguous to a specific natural heritage feature or area where it is likely that development or site alteration would have a negative impact on the feature or area.” A significant portion of this development is proposed to be located on lands adjacent to Provincially Significant Coastal Wetlands, in some cases within 30 -15 m of significant Coastal Wetland shoreline, as opposed to 120 m.</p>	<p>Acknowledged.</p>	<p align="center">FOTENN</p>	
4.11	<p>In our review of the Stage 1 to Stage 4 Archaeological Assessments we have discovered that this site has been used by indigenous people for over 4,000 years. An astounding 5,050 artifacts were found during the Stage 4 assessment, including 2,703 faunal specimens which speaks to the historic natural heritage value of the site. Based on the Stage 4 assessment we suspect that other artifacts may well be at the site. These and surrounding lands have incredible indigenous cultural heritage value and natural heritage value.</p>	<p>Archaeological assessment being completed per provincial guidelines in direct consultation with first nations.</p>	<p align="center">FOTENN</p>	

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4.12	Comments on the EIS and its failure to identify and address negative impacts	"Negative Impacts" were discussed in the EIS. It might be helpful to note that one of the purposes of the EIS process is to try to resolve negative impacts ahead of time before submission of the report , such as through re-design, and re-design was undertaken, and continues to be undertaken. The EIS also discusses, through recommendations, how negative impacts can be avoided, such as with timing windows.	ECOLOGICAL SEVICES	
4.13	<p>The approach taken by the EIS does not follow the recommended approach in the OP. According to the proponent: "The focus of an EIS is to determine if significant natural heritage features are present, and if present, whether a proposed development will result in a negative impact to those features."</p> <p>However, the OP requires that: "The EIS shall demonstrate that the proposed use will have no negative impact on significant natural heritage features and areas and their associated ecological functions." (bold and italics added)</p> <p>As stated in the EIS, the focus is on significant natural heritage features. Accordingly, much less focus is put on significant natural areas. For the most part these areas (and their associated ecological functions) are discussed in a perfunctory sort of way in the EIS, if not in a dismissive way at times, e.g. the justification given for putting structures less than 30 m from the West Lake PSW.</p>	<p>On page 20 of the OP, the term "area" is used for organizing natural heritage features. For example, a natural heritage feature that is normally covered in EIS efforts are wetlands, and these are listed as a category of Schedule B: Natural Features and Areas. One can call a wetland an area, but by EIS standards it is a natural heritage feature, and wetlands were assessed in the EIS in this regard. "Natural Core Areas" is a separate category under Schedule B, and eleven of these are identified in the Schedule B mapping for PEC. The reason for identifying each in Schedule B varies, but a common element of many is either/and a wetland association or a coastal association. The Natural Core Area associated with the applicant lands is the South Bloomfield Area, which includes coastal wetland, PSW, woodlands, and all of these were assessed in the EIS under their own headings. The Sough Bloomfield Core Area also contains parts of the Warnings Creek Sub-Watershed (although it is its own category in Schedule B), and it is located upstream of the applicant lands, and would therefore be largely immune to impacts that occur downstream. Natural Core Area Linkages are also listed on page 20 of the OP, but these are not identified for the applicant lands.</p>	ECOLOGICAL SEVICES	
4.14	<p>Our review of the EIS indicates that the EIS tends to downplay the ecological significance of natural areas as well as their associated ecological functions on a consistent basis, as shown in the bullet points below:</p>	<p>Noted. We respectfully disagree. Our task is to describe the ecology of a significant natural heritage feature, but also its sensitivity. It is not uncommon for a significant natural heritage feature in the region to be relatively immune to adjacent development. The reasons are varied and complex, but are often due to a history of acclimation to these impacts, be they farming or development related.</p>		
4.15	<p>In regards to the Regionally-Significant Bloomfield Creek Wetland ANSI (Life Science), the proponent is essentially claiming that development will have a net-zero impact to the biodiversity of this ANSI because the biodiversity in the Bloomfield Creek Wetland ANSI is already low, i.e. "As such, a reduction in biodiversity is not expected as it is already low."</p>	<p>We preface all ANSI responses, in noting that it was primarily two of us from Ecological Services who produced the 2001 document that made the ANSI recommendation selections that were then reviewed by the MNRF and the County who then enshrined these for OP purposes. The ANSI selection process we used for Region 6E-15 (which includes all of PEC) was based on criteria provided by the province for all ANSI selections in the province. One of the criteria in selecting an ANSI is "Condition" and the Bloomfield ANSI did not score well in this regard when we were conducting our study in 2001. From an EIS perspective as it relates to negative impacts, the ecological sensitivity of a site is considered. Those sites that are deemed to be more ecologically sensitive require greater protections. Sites that are dominated by non-native species (as is the case here) are not sensitive, making them more tolerant to impacts.</p>	ECOLOGICAL SEVICES	

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4.16	<p>Although it's reasonable to expect that biodiversity levels have fallen during the past twenty years in the ANSI, it seems absurd to propose that biodiversity in this ANSI has declined to the point where it can no longer be negatively impacted by development. It seems unprofessional to hold such a position and have virtually no evidence in support of such a position.</p>	<p>The dominant ANSI species in proximity to the subject lands is narrow leaved cattail, and the research literature has shown the harm that this non-native invasive species has done to wetlands in the province since its introduction. The primary harm has been a significant loss of wetland biodiversity. The next step down from the status quo, from a biodiversity impact perspective, would be if the impact was so damanging, it would eliminate the cattails that form the base of the ecological system here. However, this species has shown a significant tolerance to nearby development, where they can be seen to thrive in urban situations or beside highways with little to no setback buffering. An extreme example, is their thriving in one of the most contaminated sediments in the province (i.e., the Davis Tannery wetland). There have been past wetland projects in PEC attempting to reverse the loss of biodirsity caused by this wetland species. Mark Ferguson, past fisheries biologist with the MNRF was instrumental in getting the first PEC wetland project underway. This is the wetland currently known as Huffs Island Coastal Wetland. Similar efforts have been undertaken in Big Island Coastal Wetland. The most recent effort in the region that we are familiar with where narrow leaved cattail has been targeted for removal is the Hay Bay Marsh project. All these restoration projects showed notable increases in biodiversity, and the Bloomfield wetland could similarly benefit, especially within that part of the wetland in proximity to the applicant lands, although there are no plans to do so as it relates to this development project.</p>	<p align="center">ECOLOGICAL SEVICES</p>	
4.17	<p>The EIS does at least recognize that any impact that would reduce the wetland features of this ANSI "could be a negative impact". However, the EIS still goes on to note that "the immediate adjacent areas of wetland are comprised of robust wetland species, many of them invasive, that would be tolerant of the kind of impacts inherent in the camp operation." The proponent is clearly concerned here with the potential negative impact to the ANSI designation status, and not with potential negative impacts to the ANSI itself.</p>	<p>As a whole, ANSI's do not represent a specific natural heritage feature, and instead they represent something that has been selected under a set of site region criteria. The Bloomfield ANSI was one of many wetlands, including significant wetlands, within Site Region 6E-15 that was selected. Other wetlands in Site Region 6E-15 were chosen for ANSI status for different criteria. Various woodlands were selected, valleylands, different alvars, and even islands were selected. Due to the varied types of ANSI's, which can have very different natural heritage features, the impact assessment is based on the selection criteria themselves. Having said that, the underlying natural heritage feature of the Bloomfield ANSI is the Bloomfield wetland, and this was assessed within the EIS.</p>	<p align="center">ECOLOGICAL SEVICES</p>	
4.18	<p>To sum up, the EIS succeeds in demonstrating that the proposed use will have no negative impact on the Bloomfield Creek Wetland ANSI. But the way it does this is highly objectionable: the EIS appears to claim that the Bloomfield Creek Wetland ANSI can in fact withstand as many negative impacts as developers can throw at it.</p>	<p>Presumably this comment refers to adjacent impacts, as direct intrusion into the wetland via filling would represent a negative imapct. Direct filling would also not be allowed under the PPS, the OP, and Regulation 41/23. In regard to adjacent impacts, the wetland is dominated by very robust species that have shown a significant ability to withstand adjacent impacts.</p>	<p align="center">ECOLOGICAL SEVICES</p>	

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4.19	According to the OP, "Life Science ANSIs are areas identified to provide high quality habitat or a high diversity of habitats, or which provide important representation of features which may be uncommon within the broader landscape... It is important that all such ANSIs receive the highest level of protection." ii	The key point here is "representation", which many consider to be the most important of the five ANSI selection criteria. The Bloomfield Wetland was selected for ANSI representation, with the key sentence in the ANSI document for Representation being " <i>Coastal wetlan features are well represented in the Site District (e.g., Sawguin Creek Marsh), but this is the best example located on an inland coastal lake</i> ". After development is completed, it will still be the representable example, and therefore it will continue to maintain the selected features for representation.	ECOLOGICAL SEVICES	
4.20	The EIS does not provide any reassurances that this ANSI will receive the highest level of protection, or for that matter even indicate that it's deserving of the highest level of protection.	The intent to protect ANSIs in PEC is evident in OP wording, although it is interesting to note that in the OP the phrase "development shall not be permitted" is not attached to ANSIs, as it is with other natural heritage features that are normally covered in an EIS. The ANSI footprint will not change as a result of the development, its location as a coastal wetland on an inland lake will not change, and its status will not change. In this regard, the development will meet the test of no negative impact.	ECOLOGICAL SEVICES	
4.21	Similarly, the EIS shows little or no concern for potential negative impacts to the West Lake PSW (Provincially-Significant Wetland):	We respectfully disagree, but if there is a specific concern that we can address we would be happy to do so.	ECOLOGICAL SEVICES	
4.22	The EIS makes note of a proposal to build structures within 30m of the PSW but goes on to note that: "Given the nature of the existing habitat, and the robustness of the adjacent PSW habitat, we have no concerns about a negative impact."	Conservation Authorities in the past were tasked with deciding how close to a PSW or fish habitat that a development could be. Knowing that buildings are relatively inert in that their presence and it was difficult to show where a building a few meters from fish habitat or a PSW could be shown to have a measurable impact. The result was a jumble of setback decisions that were difficult to manage. Therefore, it was determined that it was better from a shoreline management perspective to have a single "hard" distance, and from this, the 30 m was borne more than 20 years ago. We agree with the 30 distance as a starting point, but are also aware that a robust wetland systems, as is the case here, are relatively immune to the type of development that is proposed here, and are therefore comfortable with stating no negative impact, especially as there are existing structures that are less than 30 m (they will be removed) from the shoreline, and mowed lawn to the waters edge. Please note that all proposed significant structures are planned to be more than 30 m from the waters edge in the submission concept plan.	ECOLOGICAL SEVICES	

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4.23	Likewise, the EIS proposes putting structures within 30m of fish habitat, yet has no concerns in doing so. According to the EIS: "(t)he current 30m area does not contribute to fish habitat and has no natural heritage significance."	Please see above response to 4.22.	ECOLOGICAL SEVICES	
4.24	The proponent also appears to have no concerns, at least from a natural heritage perspective, with locating a parking lot closer than 30m to the PSW. iv	The proposed parking area in the original plan was mowed lawn, and the difference in impact from a mowed lawn and a gravel parking area can be made negligible with appropriate stormwater controls. The new plan has the parking area in farm field more than 30 m from the PSW. Past fertilizers and pesticides were used in the farm field, so it could be argued in this regard that the parking lot is an improvement, especially as stormwater controls are planned.	ECOLOGICAL SEVICES	
4.25	The EIS also makes note of a proposal to construct a "cul-de-sac" next to West Lake "to provide vehicle access to the lake." (diagram below) The proponent notes that this feature will be closer than 15m to the lake edge. In the context of the EIS, it's arguably more accurate to say that this feature is less than 15m from West Lake PSW.	ES: The comment about the cul-de-sac was made in regards to Fish Habitat specifically in Section 7.3 of the EIS. It is our understanding that all required setbacks have now been met by re-designing the development, and this is evident in the latest concept plan. This includes a redesign of the "cul-de-sac" area. Our recommendation for access point alteration was to use a material that would allow grass to grow through it and be mowed, but still support vehicle weights. F: Not a cul-de-sac, this is an emergency turnaround and boat access point.	ECOLOGICAL SERVICES / FOTENN	
4.26	The EIS does at least note the potential for negative impacts on fish habitat if there is a need to drain the swimming pool: "there are potential impacts to the adjacent fish habitat that will need to be considered such as with chlorine, bromine, copper, pH, and temperature." However, instead of demonstrating that the proposed use will have no negative impact on fish habitat as required in the OP, the EIS passes off the problem to Jewell Engineering to develop a proper protocol to ensure no negative impacts to the fish habitat associated with pool management.	Correct. As ecologists we are not qualified to assess chemical/physical impacts, other than to raise a potential concern, such as with chlorine. It is also our understanding that Jewell Engineering would consult with the MECP in this regard. If biological input is required, we would be happy to participate, but it is premature at this point as the details of swimming pool management need to be determined.	ECOLOGICAL SEVICES	

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4.27	<p>In our view, the proponent needs to go back to the drawing board, to begin to address the potential negative impacts from vegetation removal and site grading - including negative impacts to riparian areas v ; negative impacts to wildlife from lights and noise; negative impacts during construction of buidings and roads and the installation of services and the negative impacts associated with recreational and seasonal development. vi In the process of addressing potential impacts, the EIS needs to focus on the fact that the PSW surrounds the subject property on three sides.</p>	<p>With the exception of the woodlands, the site is already developed, either for recreational purposes or for farming. This means the potential for significant upland/aquatic habitat interactions is not high, which reduces the potential for impact risks. In the non-woodland areas, ecological functionality of riparian areas is low, especially along West Lake, where lawn is mowed to nearly the waters edge. Except for a few lake access points, there will be no development in the riparian areas. We have no concerns with noise impacts, and from our own experience, we know that cattails offer significant sound dampening. Evidence of light impacts to nesting ocean turtles has been documented. However, there is a lack of research evidence showing light impacts to Ontario aquatic species, and turtles in particular. Nevertheless, mitigation measures that are sometimes applied to developments near water in Ontario, such shielding lights on their lake/wetland sides, and these can be applied here.</p>	<p>ECOLOGICAL SEVICES</p>	
4.28	<p>To sum up, the EIS tries to demonstrate that the proposed use will have no negative impact on the West Lake PSW or on its ecological function. However, it ultimately fails to demonstrate this due to its glaring failure to address the potential for negative impacts to the PSW (and to the ecological function of the wetland) that might reasonably be expected to occur as a result of this major development in the first place.</p>	<p>With the exception of the woodlands, the site is already developed, either for recreational purposes or for farming. This means the potential for significant upland/aquatic habitat interactions is not high, which reduces the potential for impact risks. In the non-woodland areas, ecological functionality of riparian areas is low, especially along West Lake, where lawn is mowed to nearly the waters edge. Except for a few lake access points, there will be no development in the riparian areas. We have no concerns with noise impacts, and from our own experience, we know that cattails offer significant sound dampening. Evidence of light impacts to nesting ocean turtles has been documented. However, there is a lack of research evidence showing light impacts to Ontario aquatic species, and turtles in particular. Nevertheless, mitigation measures that are sometimes applied to developments near water in Ontario, such shielding lights on their lake/wetland sides, and these can be applied here.</p>	<p>ECOLOGICAL SERVICES</p>	
4.29	<p>The EIS notes that the Cul-de-Sac feature "is intended to provide vehicle access to the lake for canoe trip <u>and potential dock access.</u>" It's hard to understand why the EIS is proposing to provide dock access when the PPS categorically prohibits development in significant coastal wetlands (PPS 2.1.4(b)) and also prohibits development in significant areas of natural and scientific interest (2.1.5(c)). Interestingly, there is a section in the EIS entitled "Policy Framework - PPS 2020" but the above-noted policies are not stated here, the reason being that this section only contains "Relevant sections from the PPS that might apply to the license update application." This cherry-picking of PPS policies is inappropriate in an EIS, and is highly deceptive and misleading when "the PPS requires that municipalities have all the facts before them when evaluating development proposals. And even if the proponent may well argue that the dock is not part of the "license update application", the Cul-de-Sac certainly is - and the EIS is clear on the purpose of the Cul-de-Sac.</p>	<p>ES: The development as discussed in the EIS does not show development within an ANSI or PSW.</p> <p>F: The emergency vehicle access, which extends down the west side of the site and provides access to the waterfront for emergency vehicles and maintenance vehicles on a seasonal basis, is located outside of any identified natural heritage feature. As shown on the updated concept plan, this emergency vehicle turnaround has been minimized to reduce the amount of surface change within the 30-metre setback from the shoreline. The access route is located approximately 28 meters from the shoreline and approximately 15 metres from the PSW to the west of the site. No development is proposed within the wetland.</p>	<p>FOTENN</p>	

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4.30	The EIS fails to demonstrate that the proposed use will have no negative impact on Turtle Wintering Areas (this is specifically in regards to a dug farm pond that the proponent plans to fill for a potential parking area) as well as on Turtle Nesting Areas.	It is our understanding that the pond cannot always be relied upon to provide overwintering due to a lack of water depth, and the MNRF Ecoregion Criterion Schedule (a required document for EIS efforts), states that man made ponds should not be considered for turtle wintering area significance.	ECOLOGICAL SEVICES	
4.31	In addition, the EIS fails to recognize the potential for negative impacts to Blanding's Turtles that may have over-wintered in the dug farm pond for many years. The EIS fails to note the propensity for Blanding's Turtles to return to the same over-wintering site every year, as these have been found to be reliable sites for over-wintering.	In our opinion, overwintering would more likely be in the core habitat areas, which in this case would be the open water areas of the wetland north of the farm fields. That doesn't mean turtles would never overwinter in the dug farm pond, but it indicates the lesser value of the pond. Ultimately however, it will be up to the MECP to decide what is allowable here. We expect they will require mitigation measures (e.g., fencing), but cannot predict whether they weill require compensation. Especially in light of the MNRF's position that wintering in dug farm ponds cannot be considered as significant wildlife habitat.	ECOLOGICAL SEVICES	
4.32	According to the MECP: "Blanding's Turtles display overwintering site fidelity, using some sites year after year...Many individuals may aggregate at one site while overwintering ... Suitable Blanding's Turtle overwintering habitat typically includes permanent bogs, fens, marshes, ponds, channels or other habitats with free (unfrozen) shallow water ... This species may also hibernate within graminoid shallow marsh areas of larger marsh complexes by burying into substrates in areas of pooled water. Blanding's Turtle may also overwinter in seasonal pools or smal excavated areas within standing water. vii	As noted above, it is our understanding that this pond does not always provide sufficient water for overwintering.	ECOLOGICAL SEVICES	
4.33	The cultural communities mapping in Figure 2 of the EIS (page 14) indicating marsh and swamp ecosites indicates the potential for specialized Blanding's turtle habitat on the Subject Property. It may turn out that the farm pond noted above may only be a tiny piece of Blanding's turtle habitat.	Like many species, Blanding's Turtles are opportunistic, and the adage of "if you build it, they will come" applies. Examples of this would be nesting in the gravel at the side of roads, nesting in newly turned earth, or exploiting farm ponds for feeding or overwintering if the conditions are appropriate. If the pond is to be removed and MECP requires compensation, we have no doubt that a new pond can be created that will be used by turtles inhabiting the Bloomfield PSW.	ECOLOGICAL SEVICES	
4.34	In our view, a detailed assessment of potential Blanding's turtle habitat (i.e. over-wintering, spring foraging, and oviposition habitat) is urgently needed. This assessment should be done by a person with experience in Blanding's turtle habitat, movements and behaviour. If Blanding's turtle habitat is found in and near the PSW, this is potentially a big problem, as the waterfront is intensively developed (e.g. an ampitheatre, a swimming pool and a Cul-de-Sac all 15m from the lake, and a Boardwalk within 15 metres of the lake. Any encountersbetween young campers and Blanding's turtles will likely end badly for the turtles.	We are qualified to assess Blanding's Turtles, and have been doing so for over 40 years. For the current project, we applied the MNRF 2015 Blanding's Turtle survey protocol. Based on that, we are confident that the West Lake shoreline area of the property is not being exploited by Blanding's Turtles.	ECOLOGICAL SEVICES	

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4.35	The potential for road mortality should be part of this assessment. Although the EIS recognizes that road mortality to Blanding's turtles on Wesley Acres Road is likely to increase as traffic levels increase, no mitigation is proposed in the EIS. The assessment does not mention the likelihood of road mortality to turtles happening on the site itself, due to dramatically increased traffic and parking and the fact that the site is bordered on 3 sides by PSW. Blandings are bound to cross the site to get from one wetland section to another. Bandings typically move up to 6kms from wetland to wetland in one season. Furthermore, the EIS fails to note the potential impacts of the cul-de-sac, a feature "intended to provide vehicle access to the lake" and parking areas, which may be used as nesting habitat.	To be clear, long distance travels by Blanding's Turtles on land occur parrallel to core habitat, and not perpendicular to core habitat. Road mortality reduction mitigation will be a topic of assessment in consultation with MECP, and turtle exclusion fencing is an oft used strategy.	ECOLOGICAL SEVICES	
4.36	We note the Notice distributed by the County to PEC residents in early June: "Many turtles, snakes, and frogs call Prince Edward County home. These creatures can be found on roadsides, trails, and areas next to wetlands and water courses especially from May to July. During this time, turtles, snakes and frogs are nesting, which means people are more likely to see them on roadways and trails as the creatures move around.	Agree.	ECOLOGICAL SEVICES	
4.37	We note that several turtle nests have been spotted in the Millenium Trail in a number of areas, including in Wesley Acres Road and Barker's Lane Provincially Significant Coastal Wetland."	Agree.	ECOLOGICAL SEVICES	
4.38	The EIS fails to consider that turtles and snakes may be attracted to certain features to bask in the sun - e.g. the cement around swimming pools, parking areas, etc. that are less than 15m from the lake. We are concerned that wildlife will not be protected in outdoor public areas.	There are no turtle basking areas on the property, and turtles will not bask in active human use areas, such as around swimming pools and parking areas. The property is predominately comprised of mowed lawn and cash crop fields, which are not favorable snake habitat features, and no snakes have been observed on the property. We note that there are no SAR snakes in PEC.	ECOLOGICAL SEVICES	
4.39	The OP states that "An Environmental Impact Study (EIS), where required by policies of this Plan, shall ... d) under no circumstances, provide a minimum buffer area adjacent to PSW and/or ANSIs features that is less than 30 metres. There is no reference to this 30 metre buffer in the EIS.	ES: We note the omission, and 30 m setbacks are being honored with the new concept plan, where the campitheater and pool are more than 30 m. F: Policy only applies to EP designation, but does apply and should be addressed in EIS and reflected in plans.	ECOLOGICAL SERVICES / FOTENN	
4.40	Furthermore, the OP immediately goes on to note in e): Provide that any required buffer enhances existing PSW/ANSIs values through buffer improvements.	We agree, and did make a buffer improvement recommendation on page 32 of the EIS. Furthermore, the removal of a failed septic system and buildings that are currently closer than 30 m will result in improvements.	ECOLOGICAL SEVICES	
4.41	We are uncertain if this implicitly grants permission to extend a buffer, if done to enhance existing PSW/ANSI values. If there was ever a need to extend the 30m buffer, this is it.	Noted, but please note that Section 4.4.3.2(8)(e) speaks to enhancements and not extensions of a buffer.	FOTENN	

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4.42	In conclusion, there is an important difference between being oblivious to potential negative impacts and demonstrating that the proposed use will have no negative impacts. In our view, the EIS for this particular proposal falls more on the side of being oblivious to negative effects.	We respectfully disagree.	ECOLOGICAL SEVICES	
	<u>Other Comments</u>			
4.43	The EIS states that: "The methodology section for ANSI designation within Ecological Services (2001) is provided in Section 10 along with the ANSI justification analysis for the Bloomfield Creek Wetland ANSI and site photos of the woodlands that we are recommending for removal from the ANSI mapping." There is no Section 10 in EIS. PECFN is therefore unable to review the ANSI justification analysis for the Bloomfield Creek Wetland ANSI.	The version dated April 22, 2024 did have Section 10, and the removal of the reference to Section 10 in the April 28, version was missed. Section 10 was removed because the ANSI boundary change process through MNRF (i.e., PAM 2.08, see page 29) was completed and the details related to that process were no longer deemed necessary to the EIS process.	ECOLOGICAL SEVICES	
4.44	According to the EIS: "The overall wetland biodiversity was recognized in 2001 primarily because it contains many different marsh and swamp vegetation communities. However, biodiversity in the ANSI has continued to be in decline since 2001 due to the spread of invasive wetland species and the portions of ANSI wetland adjacent to the development are dominated by invasive species." PECFN agrees that biodiversity is in decline all over, however we do not agree with the inference in the EIS that the wetland - or at least the portion of wetland adjacent to the subject lands - is in such a state of decline that it is effectively a Regionally-Significant Life Science ANSI in name only, due to the decline in biodiversity.	In our 2001 study in determining what areas to designate as ANSI's in PEC, the Bloomfield wetland did not score well under the Condition criteria. At that time, it was opined that nutrients from farm fields were an important factor for the poor condition. Since that time, it is evident that the narrow leaved cattail has expanded its presence within the wetland to the detriment of other species. This species has a tolerance to poorer water quality than native aquatic emergents and has harmed many other coastal wetlands in PEC. Wetland restoration efforts in PEC wetlands have targeted the negative impacts of this species.	ECOLOGICAL SEVICES	
4.45	Appendix B in the EIS (Terms of Reference and Submission Standards for Proponents and their Consultants) notes "The potential for Alvar (a provincially significant vegetation community that has been found in Prince Edward County) should be specifically assessed through surveys at the appropriate time of the year." Apparently the proponent considered that alvar surveys were unnecessary: Table 5 in the EIS notes that the "Site and adjacent natural areas are common habitat types in the region". Nevertheless, alvar should be specifically assessed through surveys, as required.	It was obvious to all ecological team members that there is no alvar on site, but furthur confidence was supplied by Dale Kristensen. He was one of the Ecological Services staff conducting field studies for this site and is a recognized alvar expert, often called upon by government and NGO's to consult on alvar matters.	ECOLOGICAL SEVICES	

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4.46	<p>The EIS identifies a cultural meadow (CUM site) located to the east of the property: "It is dominated by grasses, but also contains typical meadow forbs found in the region, and red cedars are starting to invade the field. CUM sites typically have limited ecological potential and low ecological sensitivity." We note that no supporting documentation is provided to support that conclusion. In fact, a report by TRCA (Toronto and Region Conservation Authority) entitled "Identification of Areas Meeting Criteria for SWH (Significant Wildlife Habitat) in TRCA's jurisdiction notes that: "Successional communities (i.e. cultural savannahs, cultural thickets and cultural meadow) should also be identified as SWH if they area: -At least 5 ha in size and immediately on the lakeshore, or - at least 10 ha in size and within any of the zones (a, b, c) identified above."</p>	<p>We are unaware of this report by TRCA, but would argue that it is a regional bias, as the mentioned features of savannah, meadow, and thicket of 5 ha., and 10 ha. are likely rare in the Toronto region where TRCA operates. In contrast, meadow/ thicket communities are common in Site Region 6E-15, which includes all of PEC. The exception would be Savannah, which is not on the subject lands. The comment in the EIS stems from the ELC manual that characterizes Cultural Meadow and Cultural Thicket as "community resulting from, or maintained by, cultural or anthropogenic based disturbances". It is also our understanding that the adjacent fields have been re-worked for farming purposes. During the site investigation, the adjacent field was observed to be dominated by plant species with low Coefficient of Conservation (CC) values (a list can be provided upon request). A low CC value is indicative of low ecological sensitivity.</p>	<p>ECOLOGICAL SEVICES</p>	
4.47	<p>Were field surveys were done in the above-mentioned cultural meadow and in other locations for Eastern Meadowlark and Bobolink? The EIS notes that Eastern Meadowlark "are known to exist in hayfields and meadows within Prince Edward County, but none were observed on the subject lands." (Table 6 in the EIS indicates that field studies were done for Eastern Meadowlark on May 15, June 13 and June 15). However, the EIS is short on detail: e.g. were these studies done at a single location or at multiple locations? Were they done at the same location on each of these three dates? Etc.</p>	<p>The birding studies were undertaken by Mr. Kurt Hennige who is well known in PEC birding circles. Amongst his many efforts, he is responsible for breeding bird squares in PEC for the Ontario Bird Breeding Atlas and is an eBird coordinator for this region. Accepted methods for breeding bird surveys can be done by walking transects or specific point counts. In our opinion, point counts are best used in large regional studies, and transects are more appropriate for smaller sites such as the subject property, as it provides a more thorough coverage. It may be helpful to note that during the breeding season, Eastern Meadowlarks and Bobolinks are relatively easy birds to survey for, as they are very vocal with their distinct calls. They are also not cryptic species during the breeding season, and are readily vsibile in their breeding behavior.</p>	<p>ECOLOGICAL SEVICES</p>	
4.48	<p>Appendix B in the EIS notes that the EIS "should summarize the relevant background studies and report the results of field work conducted during the current study. The study area, survey dates, and field methodology should be discussed in detail". Table 1, "Site Visit Summary" is not detailed enough.</p>	<p>We agree that Table 1 provides limited information, however, the Methods section that contains Table 1 outlines protocols that we would follow for field work. As well, please see Section 9 of the EIS.</p>	<p>ECOLOGICAL SEVICES</p>	
4.49	<p>In our view, desktop studies are adequate, but are not sufficient, for determining candidate significant wildlife habitat i.e., the results in Table 7.6. Field studies are needed.</p>	<p>Please see Table 3 of the EIS. This is a summary of the Ecoregion Criteria schedules that are first assessed at a desktop level, and then must be confirmed with field efforts. This process was undertaken for the EIS.</p>	<p>ECOLOGICAL SEVICES</p>	
4.50	<p>No information is provided in the EIS regarding who surveyed the marsh and swamp vegetation communities and their qualifications, how often surveys were done and for how long (one year or over multiple years) and when survey(s) were done i.e. the time of year.</p>	<p>Field studies for marsh and swamp vegetation were undertaken by Rob Snetinsinger who has been undertaking Wetland Evaluations in the province for 39 years as a certified wetland evaluator. He was assisted by Dale Kristensen who is a botanical specialist and is the past curator of the Queen's University Fowler Herbarium. Both Mr. Snetinsger and Mr. Kristensen have an M.Sc. in Biology.</p>	<p>ECOLOGICAL SEVICES</p>	

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4.51	The proponents does not appear to have consulted with the MECP as required in section 3.1.5(4) of the PEC Official Plan, at least there is no evidence of ay such consultation taking place in the EIS.	ES: MECP will be consulted with for SWM purposes at the site plan control stage. They will also be consulted on Species at Risk purposes, and this will be initiated through the Information Gathering Form process. F: We anticipate MECP involvement at the site plan control stage, when detailed plans for stormwater management and septic will be available. Rob S. to comment further.	ECOLOGICAL SERVICES / FOTENN	
4.52	The EIS notes the significant cultural disturbance to the subject lands in the past: "In summary, the subject lands have an almost 200 years of significant cultural disturbance, which has influenced its current ecological features and functions." It seems to us that this completely misses the point, which is that these past disturbance may come to be seen as insignificant next to the reality of what is being proposed on hese lands now. In our view this development poses a greater threat by far to ecological features and to significant natural heritage areas and to their associated ecological functions than farming ever did.	We respectfully disagree. Impacts from farming can be considerable, especially as farmers are exempt from many of the ecological protection restrictions that are applied to developments.	ECOLOGICAL SEVICES	
4.53	The mapping in the EIS is inadequate. There is no clear map of the subject lands / project area in relation to surrounding roads. It is difficult, if not impossible, to identify the location of the various structures that are being proposed on the site, e.g there is no map showing where the woodland cabins are located. The PSW map in section 7.1 is unhelpful e.g. no roads are shown, and no proposed roads are shown that would allow us to see the relationship between the roads and all the wetlands.	The required distance for EIS assessment purposes is 120 m. Please see pages 3, 34, and 37 for image locations of the proposed interior cabins.	ECOLOGICAL SEVICES	
4.54	The EIS also fails to clearly indicate that the entire area is a Provincially Significant Coastal Wetland, and these wetlands tend to be dynamic. This is a cause of some concern when the proposal includes so many structures in such close proximity (15 metres and less) from the Lake Ontario shoreline.	ES: The required distance for EIS assessment purposes is 120 m. However, we did reference and discuss the Bloomfield PSW as a whole in Section 7.1 of the EIS. . F: Per the updated concept plan, no structures are proposed within 30-metres of the shoreline, with the exception of a small encroachment of the campitheater. Despite this minor encroachment in the 30 metre setback, the campitheater still maintains a 15-metre setback from the 100-year flood line and a 6-metre setback from the erosion hazard limit. A pathway and emergency vehicle access are also proposed to encroach within the 30-metre shoreline setback, however both access features remain outside of the 15-metre setback from the shoreline.	ECOLOGICAL SERVICES / FOTENN	
4.55	The EIS makes no mention of historical data from agencies such as NHIC, OMNRF, e-bird, i-Naturalist, etc. One of our members has marsh-monitored in this area for 12 years. None of the data collected on wildlife sightings in the area (on the site or in close proximity) is referenced in the EIS. If it had been - and if the proponents had done its homework and sought out historical records of documented wildlife use at the site - the proponents would have realized that the area is much more biologically diverse than they are assuming.	These data sources were accessed. Rather than list them individually, they are all covered within the MNRF (2018) and MECP (2019) screening protocols, and these were referenced in the EIS on page 11 and 17.	ECOLOGICAL SEVICES	
4.56	Based on our review of the project documentation it is our opinion that the proponents and the consultants have not done due diligence.	If there are specific needs that the commenters would like addressed, beyond what was submitted, we would be happy to do so.	ECOLOGICAL SEVICES	
EAC Conclusions				
4.57	As stated at the outset, a major concern with this application is the issue of Natural Core Areas and the current ICBL.	Noted.	FOTENN	
4.58	Secondly, it is clear from our analysis and the advice provided by PECFN that at an absolute minimum a peer review is required of the very incomplete EIS.	A 2024 peer review by B. Muncaster of Muncaster Environmental Planning was undertaken.	FOTENN	
5.0	EIS - Peer Review			
August 28, 2024 Bernie Muncaster [Principal] Muncaster Environmental Planning Inc.				

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Rezoning Application - Campfire Circle - 565 Wesley Acres Road				
5.1	General Commentary			
5.2	The requirements for an Environmental Impact Study, as established in Section 2.1.6 of the Provincial Policy Statement and the County Official Plan, including Sections 3.1 and 5.1.9, are met by the Ecological Services EIS, with recommendations outline below for modifications to some of the wetland and fish habitat setbacks.	Noted.	ECOLOGICAL SEVICES	
5.3	The proposed septic servicing is addressed at the end of Section 7.0 (page 24).	Noted.	ECOLOGICAL SEVICES	
5.4	In addition, the final EIS should assess the recommended stormwater management approach and the updated development plan.	Noted.	ECOLOGICAL SEVICES	
5.5	The EIS needs to include direct references to the natural heritage features and other designations shown on the OP Schedules. For example, a setback of Environmental Protection Area is shown along the West Lake shoreline on Schedule A-3.	Noted.	ECOLOGICAL SEVICES	
5.6	The site is within a Natural Core Area, as shown on Schedule B and flood lines are shown on Schedule C.	Noted.	ECOLOGICAL SEVICES	
5.7	Though some components are completed by other disciplines such as stormwater management and floodplain analysis, a brief summary of the conclusions and implications for the site development should be included the EIS.	Noted.	ECOLOGICAL SEVICES	
5.8	Appropriate sources for background information were consulted, including the Ontario Reptile and Amphibian Atlas, Ontario Breeding Birds Atlas, and the Natural Heritage Areas: Make-a-map. An extensive number of field surveys were completed between April and July, 2022 to provide observations during the optimal time for most natural heritage features.	Noted.	ECOLOGICAL SEVICES	
5.9	Table 1 could indicate that weather conditions for many of the surveys are provided in Section 9.	Table 1 was intended as a summary of site visits only. Weather details are relevant for EIS reporting purposes, and these were provided in Section 9, along with other field survey specifics.	ECOLOGICAL SEVICES	
5.10	The field surveys suitably cover the requirements for amphibians, breeding birds, and other flora and fauna features and are considered sufficient to support the EIS.	Noted.	ECOLOGICAL SEVICES	
5.11	The vegetation descriptions, including Section 6.2, species lists in Section 9, and assessment of Species at Risk in Section 7.0 are thorough as is the significant wildlife habitat assessment in Section 7.6. Black ash needs to be included in the discussion of endangered and threatened species in Section 7.0. I agree with the conclusions regarding potential Species at Risk in Section 7.0.	Noted. Black Ash is on the ESA lists because of the Emerald Ash Borer, and not due to habitat loss. This is similar to the inclusion of Butternuts because of the canker, and SAR bats due to the white nose fungus. No black ash were observed nor expected due to the nature of the adjacent wetland (i.e., marsh), although transitional tree/shrub areas between marsh and upland were investigated for the presence of black ash. Potential black ash habitat (i.e., swamp) to the northeast off property was not investigated as it was on the adjoining property, but this potential area will be more than 30 m from any development area, which is the expected MECP mitigation separation distance for black ash (Monique Charette, pers. comm.).	ECOLOGICAL SEVICES	
5.12	The EIS contains many map excerpts which are valuable when referring to specific features and functions in each sub-section of the EIS. However, the EIS needs more comprehensive mapping so the reader can understand the overall context of the proposed development with respect to wetland boundaries and fish habitat and other features and functions and associated setbacks. This information should be overlaid on the aerial photography. Much of this information is on Figure 1 but is difficult to read.	Noted.	ECOLOGICAL SEVICES	
5.13	An overall figure should include an airphoto base, the site boundary, the wetland/ANSI boundaries and names, and associated 15 and 30 metre setback lines clearly identified, and components of the proposed development.	Duly noted.	ECOLOGICAL SEVICES	

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5.14	It is our recommendation that best management practices do not include placing surface parking immediately adjacent to a wetland habitat that is part of a provincially significant wetland (see top of page 27, Section 7.1). It is recognized that this use will have minimal impacts and will be on existing disturbed areas, but development of the site should include many opportunities for natural heritage enhancement rather than just no impacts.	It is the intention to have the parking area outside of the 30 m setback. To clarify, it was not suggested in the EIS that a parking lot is a Best Management Practice. However, when a parking lot is proposed in proximity to a significant natural area, then Best Management Practices as it relates to construction and design (usually stormwater related) are recommended, and can include natural heritage enhancement.	ECOLOGICAL SEVICES	
5.15	By having a setback for the parking in this area, in combination with plantings of native trees and shrubs there is the opportunity to enhance the existing conditions.	Noted.	ECOLOGICAL SEVICES	
5.16	The EIS does clearly indicate a wetland setback of 30 metres for more intensive uses such as the new residence. In addition to providing a greater wetland setback for the surface parking in the north-central portion of the site, consideration should be given to pulling back the campitheater and cul-de-sac, as described in Section 7.3 (page 31), further from the West Lake shoreline.	It is the intention to have the campitheatre outside of required setbacks, and it is our understanding through consultation with the applicants consultants and Paul McCoy (QC) that there is no concern with this new outside placement. It is the intention to remove the culdesac, and replace it with a minimized turnaround with a surface material that will allow vegetation to grow.	ECOLOGICAL SEVICES	
5.17	On page 32 of the EIS, the proposed area of no tree removal and natural enhancement area should be extended beyond five metres north of the normal high-water mark of West Lake to provide further enhancement of the site. A fifteen metre setback, excluding the boardwalk, would be more typical.	From our assessment of the shoreline, there is some potential for soil instability right at the shoreline due to the drop off from upland to lake. Some wave erosion of the shoreline was observed. From a natural causes perspective, this risk would occur regardless of what plants grow along the shoreline. As a result, our intended purpose with the setback in the EIS would be to make it less desirable to foot traffic, which could increase the instability by trampling. Planting something less desirable to walk through than the existing lawn could help acheive this. While we agree from an ecological perspective that enhancement is an ecological improvement, the test for the EIS is negative impact, and maintaining the status quo (i.e., lawn) beyond 5 m would not constitute a negative impact in our opinion as it is a status quo situation. Having said that, we would maintain any trees that currently exist within the 30 m zone, and most of the existing trees appear to do so.	ECOLOGICAL SEVICES	
5.18	In Section 7.5 (page 34) I agree with the assessment of the significant woodlands and associated recommended potential mitigation measures for setbacks, retention of larger trees, and use of existing disturbed areas.	Noted.	ECOLOGICAL SEVICES	
5.19	Similarly, I agree with the analysis of significant wildlife habitat in Section 7.6 and that no compensation is necessary for removal of the dug pond.	Noted.	ECOLOGICAL SEVICES	
5.20	Good mitigation measures are recommended such as location of the archery range outside of the forest, leaving felled trees within the forest, removal of only smaller trees for boardwalk construction, relocation of fish and other wildlife as part of removal of the dug pond, and locating the tree house and residence more than 30 metres from the adjacent wetlands.	Noted.	ECOLOGICAL SEVICES	
5.21	Similarly, excellent mitigation and enhancement for turtle utilization such as permanent exclusion fencing and creation of turtle nesting sites is provided, along with nesting structures for barn swallow.	Noted	ECOLOGICAL SEVICES	
5.22	I agree with the timing window of April 1st to September 30th for tree removal associated with potential bat utilization as bat surveys were completed and no eastern small-footed myotis (with an extended timing window in southern Ontario) were detected.	Noted	ECOLOGICAL SEVICES	
5.23	I also agree based on the information provided no discussions are required with MECP regarding Species at Risk bats.	Noted	ECOLOGICAL SEVICES	

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5.24	Bobolink and Blanding's turtle issues are to be addressed through the MECP process, beginning with submission of an IGF, s recommended in the EIS	Noted	ECOLOGICAL SEVICES	
5.25	Also as noted in the EIS, additional assessment and agency consultation is required for any in-water work, including placement of permanent docks.	Noted	ECOLOGICAL SEVICES	
	Suggestions			
5.26	The following are suggested to assist in the interpretation of the EIS:			
5.27	The results of pre-consultations with the County and Quinte Conservation should be added to the EIS, perhaps in an appendix and referenced in the text.	Noted. See August 3, 2022 letter from PEC by James Griffin	ECOLOGICAL SEVICES	
5.28	Page 11, Section 4.: could indicate which field biologists have completed the Ontario Wetland Evaluation System and Ecological Land Classification courses.	Mr. Snetsinger has completed the Ontario Wetland Evaluation and the Ecological Land Classification courses. Mr. Kristensen, completed the Ecological Land Classification course.	ECOLOGICAL SEVICES	
5.29	Page 11, Section 4: details on the review of the Natural Heritage Areas: Make-a-map database would be helpful, including the date of review, squares accessed, and the species listed	<p>Make-a-map was consulted before, during, and after the production of the EIS related work, although we cannot provide the specific dates when this was undertaken. Our standard procedure is to assess the 1 km squares that a subject land exists within, and all adjacent 1 km squares to those. Most of the make-a-map species were included in the discussions, the few exceptions left off due to a lack of sightings and the clear unsuitability of the habitat. If requested, we are happy to discuss those excluded species in particular. The ability to change wetland boundaries was streamlined in 2024 and was therefore not contemplated for the earlier written EIS. Since most of the mapped wetland boundaries do not vary significantly from what we encountered in the field, we elected to go with the status quo, especially as it often favored the wetland. One notable exception was the northeast area of the property that was in farm use during the first birding field visits. The boundary was incorrectly shown to occur within the field where the Bobolink were nesting. The actual wetland boundary begins a few m north of the field line. The boundary line has been corrected and is now correctly represented in NHIC mapping. h of the farm field. There is also an area of upland along the west side of the access road that could be as large as 0.18 ha., and could extend as far as 35 m into the wetland. It was considered as being part of the wetland for ELC purposes as it is less than 0.5 ha., but should it prove to help with ongoing EIS deliberations, we will go back to the site and provide a precise assessment of this parcel of land as being upland or wetland.</p>	ECOLOGICAL SEVICES	

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5.30	Page 14, Section 6.2: Figure 2 would benefit from a delineation of the site boundary and a scale. This Section should also comment how on how the field delineated wetland boundaries compared to the mapped wetland boundaries and what changes in the wetland boundaries, if any, are proposed.	Noted.	ECOLOGICAL SEVICES	
5.31	Page 18, Section 7.0: black ash needs to be assessed as the exemption under the ESA has now ended (see Ontario Regulation 6/24) and suitable wetland habitat would appear to be present. Black ash is not identified in the flora species list in Section 9 or elsewhere in the EIS, but it should be noted as not present in Section 7.0.	Duly noted. No black ash were observed nor expected due to the nature of the adjacent wetland (i.e., marsh), although transitional treed/shrub areas between marsh and upland were investigated. Potential black ash habitat (i.e., swamp) to the northeast was not investigated as it was on the adjoining property, but it will be more than 30 m from any development area, which is the expected MECP mitigation separation distance for black ash (Monique Charette, pers. comm.).	ECOLOGICAL SEVICES	
5.32	Page 19, Section 7.0: it is not clear why additional bobolink surveys would be necessary if they were observed nesting on-site in 2022	The field where the Bobolink were observed nesting in 2022, was no longer suitable for nesting in 2023 and 2024. It is not known when this area will be developed, or what the future farming plans will be and therefore having a continued survey efforts will assist MECP in decision making through the IGF process.	ECOLOGICAL SEVICES	
5.33	Page 21, Section 7.0: just a typo in point 4. of the BLTU habitats: too young to be nesting)	Duly noted.	ECOLOGICAL SEVICES	
5.34	Page 22, Section 7.0: mention is made to Garrat Island in the assessment of eastern sand darter. In the northwest portion of West Lake, this island would not appear to be directly connected to the study area for the current site.	That is correct. The wording in the EIS was originally written in reference to a camp upgrade for Garratt Island, and this wording was not corrected for the current site. The sand darter is considered extirpated from West Lake.	ECOLOGICAL SEVICES	
5.35	Page 28, Section 7.2: third paragraph refers to ANSI methodology provided in Section 10 of the EIS. Not a requirement, but just a note that I did not see this Section in my copy of the EIS.	The version dated April 22, 2024 did have Section 10, and the removal of the reference to Section 10 in the April 28, version was missed. Section 10 was removed because the ANSI boundary change process through MNRF (i.e., PAM 2.08, see page 29) was completed and the details related to that process were no longer deemed necessary to the EIS process.	ECOLOGICAL SEVICES	
5.36	Page 30, Section 7.2: the analysis on fish habitat should include a statement on whether drainage features/channels with fish habitat potential such as tributaries to West Lake are present on site, outside of West Lake and the wetland habitats.	There are no active drainage channels on the property that feed into wetland habitat or West Lake.	ECOLOGICAL SEVICES	
5.37	Page 39, Section 7.6: typo at end of first paragraph of turtle wintering areas: should be no concerns for impact.	Noted.	ECOLOGICAL SEVICES	

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5.38	Mitigation measures to address the potential spread of invasive vegetation, such as proper cleaning of site equipment, are recommended	Noted. As we are ecologists we have no expertise or authority to advise on an appropriate methodology in this regard and can only refer to documents, such as the protocol provided by the Ontario Invasive Plant Council. https://www.ontarioinvasiveplants.ca/wp-content/uploads/2016/07/Clean-Equipment-Protocol_June2016_D3_WEB-1.pdf	ECOLOGICAL SEVICES	
5.39	A planting plan is recommended for planting native and local-stock trees and shrubs within current open portions of the wetland and aquatic habitat setbacks. This planting plan should be referenced in the final EIS.	A planting plan has not been required for rezoning, but one will be completed for the site plan application. Ecological commentary may be provided at this point. Please note that the intervening open spaces are currently maintained as either farmland or lawn. We agree that a planting plan would be helpful for intervening open spaces that currently are in cash crop as they do not provide good stormwater mitigation as they involve baring the ground. In contrast, the intervening lawn areas next to West Lake do have stormwater mitigation potential, and this is corroborated by stormwater research. A naturalized area of native plants would be an ecological improvement over lawn, but as previously noted, it is our opinion that enhancement is a separate issue from the EIS perspective of negative impact, unless that enhancement is added for mitigation purposes.	ECOLOGICAL SEVICES	
Conclusions				
5.40	I agree with the majority of assessments and associated conclusions of the Environmental Impact Study.	Noted.	ECOLOGICAL SEVICES	
5.41	However, the setbacks from the Provincially significant wetland and West Lake need to be reassessed for site alterations within 15 metres, excluding the boardwalks.	It is our understanding that required setbacks have now been met by re-designing, and this is evident in the latest concept plan.	ECOLOGICAL SEVICES	
5.42	I do not believe that the current setbacks which are less than 15 metres are consistent with the spirit of the Provincial Policy Statement and the Prince Edward County Official Plan.	It is our understanding that required setbacks have now been met by re-designing the development, and this is evident in the latest concept plan.	ECOLOGICAL SEVICES	
5.43	Development appears to be proposed within an Environmental Protection Area, as identified in the County OP.	The mapping in the County OP Schedule A-1 is not a high resolution map, which means it lacks preciseness. This is also noted in Section 4.4.3.2. of the PEC OP where the mapping is referred to as generalized and that more precise mapping can be done through an EIS. This was one of our tasks, and we were able to show that the development is not within EP areas.	ECOLOGICAL SEVICES	
Recommendations				
5.44	The Environmental Impact Study is thorough and well prepared and includes many helpful assessments of natural heritage features and associated mitigation measures.	Noted.	ECOLOGICAL SEVICES	
5.45	However, a re-assessment is required for the wetland and aquatic habitat setbacks which are currently less than 15 metres.	It is our understanding that required setbacks have now been met by re-designing the development, and this is evident in the latest concept plan.	ECOLOGICAL SEVICES	
5.46	The EIS needs to be a standalone document and once the development plan and stormwater management approach are finalized, the EIS is to be updated with the recommendations of the stormwater management, erosion and sediment control, and landscape planting plans, and finalization of the wetland and shoreline setback areas.	Erosion, sediment, and planting plans have not been required for the rezoning application but commentary on outcomes from a ecological perspective can be made once these deliverables are completed. As the authors of the Natural Heritage part of the EIS, it is our opinion that this part of the EIS process is stand alone. As we are not experts in stormwater management, erosion and sediment control, and landscape planting and we defer to the applicants planning consultants to package all the appropriate documents written by the appropriate experts into one document, such as the stormwater report by Jewell Engineering	ECOLOGICAL SEVICES	

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CAMPFIRE CIRCLE.



No.	COMMENTS	RESPONSE	CONSULTANT RESPONSIBLE	ADDRESSED (Y/N)
5.47	Incorporation of recommendations from Quinte Conservation would be helpful.	Noted.	ECOLOGICAL SERVICES	
6.0	Engineering County's Comments			
	August 27, 2024 [NTD: Personnel TBC] [NTD: Title of Position TBC]			
	Rezoning Application - Campfire Circle - 565 Wesley Acres Road			
6.1	Septic will need approval from the MECP.	Agreed. Section 53 of the Ontario Water Resources Act requires an ECA from MECP for private sewage works with a capacity in excess of 10,000 litres per day. Note included in FSR.	JEWELL / GROUNDWORK	
6.2	Nitrate loading at the property line, should be considered	Nitrate removal of will be required. Refer to FSR.	JEWELL / GROUNDWORK	
6.3	Road going through the middle of a pond should be removed	Road has been relocated see updated concept plan.	JEWELL / GROUNDWORK	
6.4	Further details are required on the design of internal road.	See Typical Road Cross-Section drawing.	JEWELL / GROUNDWORK	