



Muncaster
Environmental
Planning Inc.

August 28, 2024

Mr. Matt Coffey, MCIP, RPP
Planning Coordinator, Approvals
The Corporation of the County of Prince Edward
332 Picton Main Street
Picton, ON
K0K 2T0

Dear Mr. Coffey:

**RE: Peer Review – Wesley Acres Road Camp, Bloomfield
Environmental Impact Study**

This letter constitutes our peer review of the Environmental Impact Study (EIS) dated April, 28th, 2024 by Ecological Services in support of a proposed camp at 565 Wesley Acres Road on the south side of the road, about 2.8 kilometres south of Bloomfield and adjacent to the northeast portion of West Lake. The camp will provide accommodations for up to 500 people, camp support buildings, and a medical accessory building. The site is dominated by agricultural lands and two upland deciduous forest parcels, with cultural habitats and adjacent wetlands.

Significant natural heritage features on and adjacent to the site include the West Lake Provincially Significant Wetland and Bloomfield Creek wetland, Species at Risk utilization, including on-site bobolink nesting and an observation of a juvenile Banding's turtle, the Bloomfield Creek Wetland regional ANSI, fish habitat of West Lake, significant woodlands, and significant wildlife habitat.

This review evaluates the adequacy of the EIS in the context of the requirements of the applicable sections of the Provincial Policy Statement and the Prince Edward County Official Plan. A field review was not completed as part of this peer review.

GENERAL COMMENTARY

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. In addition, the final EIS should assess the recommended stormwater management approach and the updated development plan. The proposed septic servicing is addressed at the end of Section 7.0 (page 24). 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. The site is within a *Natural Core Area*, as shown on Schedule B and flood lines are shown on Schedule C. 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.

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. Table 1 could indicate that weather conditions for many of the surveys are provided in Section 9. 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.

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.

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. 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.

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. 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. 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. 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.

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. 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.

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. 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.

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. I also agree based on the information provided no discussions are required with MECP regarding Species at Risk bats. 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. Also as noted in the EIS, additional assessment and agency consultation is required for any in-water work, including placement of permanent docks.

SUGGESTIONS

The following are suggested to assist in the interpretation of the EIS:

- 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.
- page 11, Section 4.: could indicate which field biologists have completed the Ontario Wetland Evaluation System and Ecological Land Classification courses.
- 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
- 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.
- 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.
- 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
- page 21, Section 7.0: just a typo in point 4. of the BLTU habitats: **too** young to be nesting)...

- 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.
- 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.
- 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.
- page 39, Section 7.6: typo at end of first paragraph of turtle wintering areas: should be **no** concerns for impact.
- Mitigation measures to address the potential spread of invasive vegetation, such as proper cleaning of site equipment, are recommended.
- 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.

CONCLUSIONS

I agree with the majority of assessments and associated conclusions of the Environmental Impact Study. However, the setbacks from the Provincially significant wetland and West Lake need to be reassessed for site alterations within 15 metres, excluding the boardwalks. 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. Development appears to be proposed within an *Environmental Protection Area*, as identified in the County OP.

RECOMMENDATIONS

The Environmental Impact Study is thorough and well prepared and includes many helpful assessments of natural heritage features and associated mitigation measures. However, a re-assessment is required for the wetland and aquatic habitat setbacks which are currently less than 15 metres. 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. Incorporation of recommendations from Quinte Conservation would be helpful.

Please call if you have any questions on the above review.

Yours Sincerely,
MUNCASTER ENVIRONMENTAL PLANNING INC.



Bernie Muncaster, M.Sc.
Principal

Wesley Acres Road EIS review



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February 13, 2025

Morning Matt,

I have reviewed the updated (February 7, 2025) Concept Plan for the Campfire Circle development and note that the parking, the campitheatre, and other components of the development have been relocated to be an appropriate distance from the West Lake Provincially Significant Wetland, other wetlands, West Lake, and other natural environment features of note. In addition, the development team responses have indicated that the final EIS will include the recommendations in the peer review including comprehensive mapping of the environmental features and associated mitigation measures, an assessment of black ash, greater tree retention, and enhancement measures such as plantings. In addition the MECP process under the ESA for Blanding's turtle and bobolink will be followed.

Based on the above changes and responses, I conclude that the revised development will be consistent with the PPS and County Official Plan and with proper implementation of mitigation measures will avoid negative impacts, as defined in the PPS, on the significant natural heritage features adjacent to the proposed development.

Please note I have not reviewed the comments by the Environmental Advisory Committee Working Group and other natural environment comments in the comment response matrix, and the associated responses by the development team.

Please let me know if you need anything else at this time and have a good day.

Bernie

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