

ECAC Working Group comments regarding EMG scoped review

Received at ECAC at its January 2024 meeting. Prepared by S. Evans, S. Hall, B. Krichker, S. Levin on February 8, 2024

ECAC finds the existing EMG's content in sections 3 and 4 to be comprehensive and in compliance with Provincial Policy which requires all municipalities to prepare Natural Heritage Systems Studies.

The draft ToFR states: City staff have heard various and repeated concerns about how the definitions of woodlands and patches were revised in the 2021 EMGs, and have seen how this can create challenges in applying the evaluation criteria for significant woodlands. This also applies to boundary delineation.

ECAC comments on Terms of Reference (ToFR) related to:

- Evaluation of significant woodlands and woodlands and;
- Boundary delineations of significant woodlands and woodlands

It would be helpful if we and perhaps the rest of the stakeholder/reference group knew what these concerns are prior to the discussion or at least at the start of the discussion on Feb 13th

(ECAC was not asked directly for its concerns and what should be part of this review.)

Section 3 of the EMG is fifteen pages of relatively detailed evaluation criteria.

To scope this even further, which subsections have been at issue and why? Again, it would be helpful to know what these concerns are prior to or at the discussion on Tuesday.

Sec 4 of the EMG has been raised as an area of concern. Again, we are unaware of the issues that have led to this being a priority. Understandably if there is issue with the identification of Significant Woodlands and Woodlands being questioned, then 4.3 would also be at issue. However, it is unclear why 4.7 is at issue. Is it the minimum size or other matter?

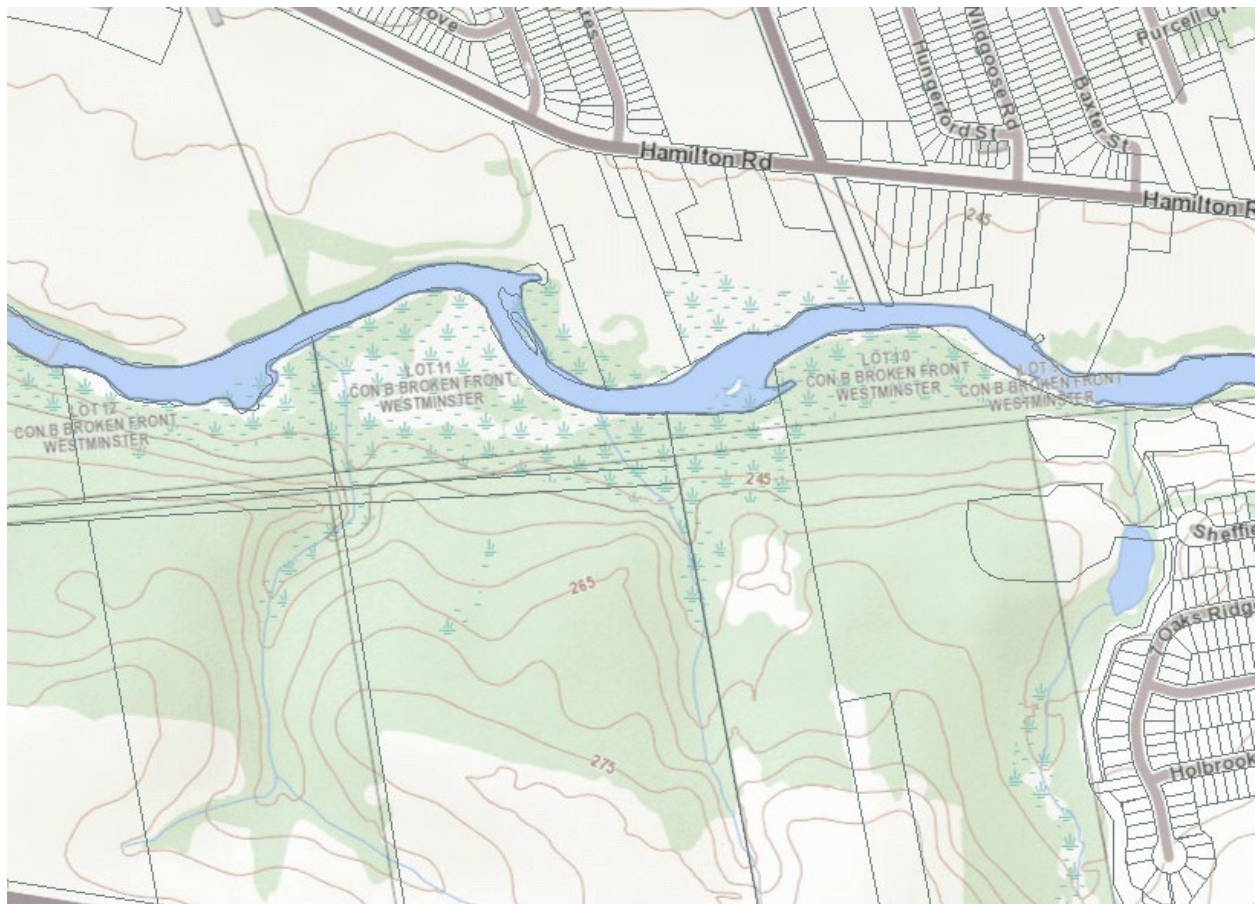
It is also understandable why 4.8 would be part of the review to determine what is included in the identified area to be protected and buffered. ECAC will be particularly interested in the outcome of this part of the review.

ECAC RECOMMENDATION FOR INCLUSION IN THIS EMG REVIEW

Although the Terms of Reference is not clear in all areas (Section 3.1 of the ToFR appears to be open to including other scoped items vs page 3 which suggests otherwise), ECAC

would like to ask that the following be included in the EMG review as an item to be added to the requirements for a submitted EIS:

An EIS must include a map of the most recent city air photo for a roughly 1 km square. Ideally the EIS should include air photos from the past 5 years to show any changes on the landscape. If other NHS features are within the 1 Km area, the EIS must indicate how the proposal will not cause a net loss of ecological function off site. Ideally, at least one map must include the site topography (see the following sample map). This issue is closely connected to the boundary delineation section of the EMG.



ECAC comments on other parts of the Terms of Reference.

We have no major concerns about the section dealing with provincial changes and housekeeping other than the following comments:

-provincial changes

Shorter review timelines under provincial legislation and that the Conservation Authorities no longer provide comment on natural heritage matters have had an effect on the reviews undertaken by a municipality. Where a municipality is not satisfied with an environmental study it can require a peer review. Should criteria be included in the EMG for when a peer review is required and development of such criteria be included in this review?

-housekeeping

We would appreciate a list of known, changes and housekeeping items (other than typos) – perhaps a list will be useful to all participants at the start of the process.

For ECAC, a housekeeping matter is how the word ‘should’ is interpreted when considering what is included in an EIS.

ECAC REQUESTS THE FOLLOWING BE INCLUDED AS A STEP IN THE TERMS OF REFERENCE

At the end of this process, the participants should be asked for recommendations for inclusions in the next review. This list would then need to be part of the staff report which would allow tracking of issues raised. An example would include post construction monitoring requirements.

- miscellaneous

ECAC has become aware of a recent (August 2023) study looking at impacts of development on habitat for freshwater turtles in Ontario. We believe this paper is highly relevant to the substance of the EMGs, and so we would ask that the consultant retained for the current review please read this study:

Auge, A.C., Blouin-Demers, G., Hasler, C.T. and Murray, D.L. (2024), Demographic evidence that development is not compatible with sustainability in semi-urban freshwater turtles. *Anim. Conserv.* <https://doi.org/10.1111/acv.12903>