

November 23, 2022

**MINUTES OF PUBLIC MEETING - NOVEMBER 22<sup>ND</sup>, 2022**

Consideration of an Amendment to the Official Plan for the District of Manitoulin to be adopted by the Manitoulin Planning Board and forwarded to the Ontario Ministry of Municipal Affairs and Housing (MMAH) for approval as required by Modification No. 21. of the Official Plan for the District of Manitoulin.

A public meeting, held at the Planning Board Office, 40 Water Street, Unit 1, Gore Bay, Ontario, was called to Order at 7:11 p.m. by Vice Chair K. Noland to hear and receive comments in support of or in opposition to of a Draft Area-Wide Natural Heritage System Strategy (NHSS) for the District of Manitoulin.

The Vice Chair after calling the Meeting to Order declared the Board Members present constituted a quorum. The Board Members present were:

- |    |             |    |              |
|----|-------------|----|--------------|
| 1. | R. Stephens | 4. | T. Mackinlay |
| 2. | E. Russell  | 5. | R. Brown     |
| 3. | D. Osborne  | 6. | K. Noland    |

Also in attendance during the Public Meeting were:

Judith Jones, ecological consultant, Winter Spider Eco-Consulting;  
Paul Best, interested party;  
Bryan Barker, interested party; and  
T. Sasvari, reporter, Manitoulin Expositor.

There were no other interested parties or members of the general public or press in attendance.

Vice Chair K. Noland

- advised he would preside over the Meeting and the Meeting would be conducted in accordance with Sections XI and XII of By-law No. 2019-01 (Procedural By-law);
- explained the purpose of the Meeting;
- instructed the Secretary-Treasurer to keep a record of proceedings;
- advised of the power of the Ontario Land Tribunal (OLT) to dismiss an appeal if an appellant has not provided the Planning Board with oral submissions at the public meeting or written submissions before the By-law is passed; and
- requested and received verification from the Secretary-Treasurer that all requirements of the Planning Act and prescribed procedures, including Public Notice, had been fulfilled for the Public Meeting.

The Secretary-Treasurer stated, for the record, there were several written submissions received to the Planning Board Office which were not attached to the Board Meeting Agenda as they had been received after the Agenda had been sent out. The submissions had not been provided to the Board prior to the Public Meeting; they included:

J. Jones, Winter Spider Eco-Consulting,  
R. Barnett, executive director, Escarpment Biosphere Conservancy (EBC),  
Liv Callo, Conservation Project Manager, Escarpment Biosphere Conservancy,  
Megan Bonenfant, Coordinator, Conservation Biology, Nature Conservancy  
of Canada, and  
Saul Bomberry, United Chiefs & Councils of Mnidoo Mnising (UCCMM).

Minutes of Public Meeting  
November 22<sup>nd</sup>, 2022 - Continued

The Vice Chair advised that any additional submissions in favour or opposed to the following item would now be heard.

Judith Jones requested to speak. She introduced herself and explained her background as an ecological consultant. Her comments included:

*- the coastal wetland mapping is not correct; many do not meet the definition of a coastal wetland; she gave examples of wetlands on top of the escarpment which cannot be coastal wetlands; she suggested showing all wetlands to save confusion of why some are identified and some are not; a precautionary approach should be applied; many linkages between wetlands and water bodies are missing; many of the linkages are incorrect; the mapping needs work and must be as accurate as possible; MPB could be challenged on applications if it is not; a document should be prepared setting out the methods to define polygons used to map the features; she did not recommend the adoption of the NHSS as is; the comment period had closed the day before; she did not have enough time to provide all her comments; the newest draft was not available until November 15<sup>th</sup>, 2022; she had provided her comments to the Planning Board staff but the Planning Board had not had time to review them yet; the draft NHSS is not ready and needs more work to make it better; she offered her planning expertise to the Planning Board.*

Paul Best advised he was there to observe as an interested party and informed the Board that Robert Barnett, wished to offer his services to the Planning Board in preparing a Draft Area-Wide Natural Heritage System Strategy (NHSS) for the District of Manitoulin.

Those others in attendance, did not state any interest in the NHSS.

The Vice Chair asked if any of the Board Members had any comments or questions.

It was the general consensus of the Board that Decision should be deferred to allow additional time to review all written comments and those comments as presented by Judith Jones during the Public Meeting.

MOTION

It was moved by R. Stephens and seconded by R. Brown that the Public Meeting be closed.

The Public Meeting was declared closed by the Chair at 7:26 p.m.

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K. Noland, Vice Chair

  
T.A. Carlisle, Secretary-Treasurer

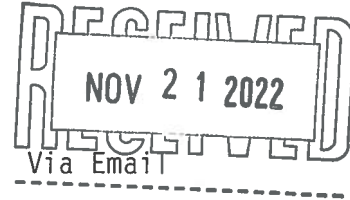
Note: Appendix "A" (attached) are the written comments received prior to the Public Meeting (21 pages).

J. Jones, Winter Spider Eco-Consulting (10 pages),  
R. Barnett, executive director, Escarpment Biosphere Conservancy (EBC) (2 pages),  
Liv Callo, Conservation Project Manager, Escarpment Biosphere Conservancy (3 pages),  
Megan Bonenfant, Coordinator, Conservation Biology, Nature Conservancy  
of Canada, (2 pages), and  
Saul Bomberry, United Chiefs & Councils of Mnidoo Mnising (UCCMM) (4 pages).

**Comments on the Draft Natural Heritage System Strategy**

Updated on November 18, 2022

Judith Jones, Winter Spider Eco-Consulting  
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To the Manitoulin Planning Board:

First of all, I strongly object to your timing. If you close the comment period on November 21, 2022 and expect to approve the draft NHS on November 22, 2022, it means that you have no intention of addressing any comments. This is not acceptable. If you do approve the plan as it stands on the 22nd without addressing anyone's concerns, I would have to object to MMAH.

With these comments, my intent is neither to derail the Manitoulin Planning Board's process, nor to make it easier either for development or for conservation. My hope is that my comments are constructive and contribute to making the Natural Heritage System (NHS) as clear and easy to use as possible, based on the best knowledge we have.

Because I do EIS and other types of environmental studies, it frequently falls to me to explain to landowners why the policies are as they are, why they are sensible, and how they may affect the landowner's plans. End users of the NHS must have solid confidence in the policy and mapping or else people are going to fight the MPB over every proposal. For example, if a wetland boundary runs through the clearing where an applicant wants to build, then it should be possible to uphold why the line is there. If it can't be upheld, then there should be a mechanism clearly spelled out for how the line will be refined. This must be the case so that the applicant will be expecting the process.

I make my comments as an expert with 27 years of experience on the ground with natural heritage in the Manitoulin Region as well as 17 years doing natural heritage studies with AWS Environmental Inc. (Owen Sound) in southern Ontario. I am also certified as a wetland evaluator although it has been decades since I did an evaluation. I would be happy to provide my CV with details of my work if requested.

**Part 1: GENERAL COMMENTS ABOUT POLICY AND MAPPING**

**1) Other wetlands (OWs) should be mapped in the NHS.**

The consultant's report recommended they be included. I am not suggesting any change in the draft NHS policy or in the Plan policy for how OWs are treated, but they must be shown on the mapping.

Rationale: The situation of the OWs is the same as it is for alvars, which are mapped as an orange feature in the NHS and which have their own policy section in the D section of the Plan. It will be confusing to the end user why some features are shown in the NHS but OWs are not, especially when they are so prevalent on the landscape.

Furthermore, the distinction between a Coastal Wetland (mapped in the NHS) and an OW (not mapped) seems to be a policy decision, based on a 1 km distance from the coast or a connection to the coast. I see no reason to show only coastal wetlands and their inland connections, especially when the policy is exactly the same for both types of wetlands (because Coastal Wetlands are OWs if not evaluated).

On top of that, the mapping has stretched the truth somewhat in that it shows a lot of OWs as coastal wetlands—either by creating an artificial linkage to the coast or because they are within a 1 km distance of a coast (even though some of them are on top of the escarpment!—see Janet Head and Gore Bay East Bluff). A coastal wetland should be one that is at the shoreline or is linked to shoreline wetlands. Connecting a wetland to another type of shoreline is bending the definition. Clearly, there is a need to show all these wetlands, so rather than stretch the definition, it would be better to be truthful about what is being shown and state that unevaluated wetlands are shown as a precautionary measure since we don't know if some might be PSWs.

I recognize that wetlands on islands in Lake Huron are not protected, which puts Manitoulin in a unique situation because we are a large island with sizeable wetlands. We have a unique chance to protect what we have, which is important for source water protection, ground water re-charge, flood protection, and mitigation of climate change (wetlands are a huge carbon sink for greenhouse gases), etc. I urge you to be forward-thinking on this.

A final point: it is the function of a NHS to be able to consider how features and areas work in the overall landscape. Therefore, it is important to have as many D features as possible mapped in the NHS so that all of the landscape can be considered at once. Without wetlands, the functions and connections of the landscape can not be accurately visualized because so many pieces are missing.

Other Wetlands are shown on the North Channel Islands outside the planning area because they were in the provincial wetlands layer and are there by default. It's not hard to show all the wetlands—they are already there.

Notes regarding the text for OWs in the draft policy document:

Section D.4.(b) 2 –Other Wetlands

Paragraph 2. Boundaries

This paragraph is trying to do two things which should be separated: A) how boundaries are determined and B) when/how policy gets updated.

A) Based on the level of accuracy of the Provincial wetlands mapping (which frequently cannot distinguish between marsh, alvar, and old agricultural fields), there are going to be times when MPB needs to ask for an on-the-ground determination of the wetland boundary. For example, an end user may protest the Plan's wetland mapping if it restricts where they can alter their property, so a study would need to be done to determine the actual situation. This does not mean an entire provincial wetland evaluation. The text should allow for this contingency.

I suggest:

"The boundaries of OW's will be defined based on information from the Province, which may be ~~amended~~ updated from time to time. Boundaries of OWs may also be refined for accuracy as part of an EIS or other study."

B) About policy: As set out in the 1st policy on p1 of the draft NHS policy, boundaries of features and areas can be refined (through EIS or studies) and once accepted by the MPB, they come into effect on the date of approval. The policy in the second sentence of this paragraph seems to contradict that in that it says MPB will review and update OWs only during a review of the OP. I would delete this sentence here and add it to Paragraph 3, which deals with policy specifically for PSWs (see below).

Delete: Where new information becomes available, the Planning Board will review and update the policies related to unidentified wetlands as part of any subsequent review to this Official Plan.

## **2) Linkages**

Because the OWs are not shown, some linkages are missing. In my comments for specific maps I have noted many places where linkages should be added. For example, in Assiginack, Francis Brook (which flows out of Turtle Lake) and its wetlands are a huge corridor that connects to the ravine below High Falls but nothing is shown. A corridor and linkage of this size should not be excluded because it is an other wetland.

On the other hand, the mapping of many linkages seems to be a little arbitrary—trying to connect things that are not really connected on the ground (so that important OWs can be called "coastal" and thus be shown). The wetlands on the 10th Line of Gordon are one example. These are not really connected to the coast, and the linkage drawn goes down a steep escarpment and across town streets. I think there would be good grounds to challenge a lot of these linkages in a study, so I think the methods and criteria used by the MPB to determine their locations should be clearly stated somewhere.

You can avoid having to worry about the validity of linkages to so called "coastal" wetlands by showing all the OWs and removing some linkage that may not really be there or that may connect elsewhere (not to a coast).

I have made comments about specific linkages in the comments for the map.

### **3) Candidate ANSIs should be mapped in the NHS**

No ANSIs have been mapped. There are 40+ candidate ANSIs. Even though they are not confirmed and thus not protected by policy, something about them should be mapped to show the same level of precautionary protection as unevaluated wetlands. Manitoulin has a lot of special cases—this is another one.

These candidate ANSIs have been identified for the natural heritage values they contain, and their potential boundaries are indicators that natural heritage features or areas are present. Unfortunately, the boundaries of many candidates were never refined (which would have been a later step in the usual process), and many of them are highly general and imprecise. However, I still strongly urge the MPB to map of candidate ANSI boundaries if they have been identified, or a centroid dot in if no boundary is available. This is needed so that the information is up front and available to users of the policy, who can then expect that a study or other steps may be necessary to clarify what features are present. However, if you are not willing to put the ANSIs in the mapping, then I suggest the following text as second best:

"[Approximately 45] candidate ANSIs have been identified in the planning area [not sure exact number without NEMI and islands—could figure it out] based on analyses by the Province. These candidates have not been legally confirmed and thus are not covered by provincial land use policies that prohibit site alterations within ANSIs. They are not shown on NHS mapping. However, these areas have been identified as candidate ANSIs because of the natural heritage values they contain, so their proposed boundaries or centroid locations serve as indicators that natural heritage features or areas are present. These features and areas may or may not already be shown on NHS mapping.

"The Manitoulin Planning Board holds information on all candidate ANSIs. If development or site alteration is proposed within a candidate ANSI, an EcoSA or other study may be required to screen for potential presence of NHS features or areas not mapped and to determine whether these may be impacted by proposed activities. Approval for proposed activities follows the policies in this strategy for the specific NHS features present."

### **4) Escarpment**

Escarpment as a feature should be shown on NHS mapping. It is the biggest linkage and natural corridor on our landscape. If escarpment is not going to be mapped in the NHS, then its function as linkage should be shown.

### **5) Peer review**

Deer yard paragraph 7 says the MPB may require a peer review. This probably needs to be said up front as a general policy not just for deer yards, but for anything. There might be situations where that need could occur for any other feature. I suggest this wording to go at the beginning of the policy:

"The MPB may require a peer review to evaluate the conclusions of an EIS or other study and its analysis of potential impacts to NHS features and areas. The cost of a peer review will normally be borne by the applicant."

#### **6) Suggestions about use of the policy**

I suggest the MPB has a responsibility to train the users of this NHS. It would be worthwhile after the NHS is adopted to provide a session to realtors, municipal staff, and anyone else interested in understanding what the policy does and how it works.

#### **7) Wording**

Grammatical corrections and wording fixes are needed in a few places to improve the clarity and accuracy of the policies.

Paragraph 3 regarding features not mapped:

I suggest:

"There may be features and areas on the landscape that are part of the NHS but which are not mapped or cannot be readily mapped."

#### **D.4.(b).1 Provincially Significant Wetlands**

Sentence is confusing:

"The boundaries of PSWs may be refined without an amendment to this Plan provided approval is obtained by (FROM?) the Province. The addition or removal of a PSW will not require an amendment to this Plan.

--Does this mean approval from the MPB obtained by the Province?? Or approval from the Province obtained by the MPB? Please clarify.

#### **D.4.(b).4 Fish habitat**

The language here is confusing. Policy and wording should be clarified.

"If it is determined [by the scoped EIS and] through consultation with DFO, that development will not impact fish habitat, then the requirement for an EIS may be waived..."

Presumably this means the requirement for a full EIS is waived? This is confusing because one can't waive the requirement for an EIS after it is already done. However, maybe a full EIS is still needed for some other NHS reason, so this would mean only that treating fish habitat as part of an EIS would be waived. This all needs to be spelled out much more clearly.

The text in 4. says a fish habitat mitigation/compensation assessment will be required. This appears to contradict the policy just stated in 3. which says that if it is determined that development will impact fish habitat, development will not be permitted. So when

exactly is mitigation/compensation acceptable, and when is development not allowed? There is a subtle difference in wording: affect fish habitat vs. impact fish habitat. What are the differences in the level of alteration? The steps and thresholds to determine this need to be clearer.

#### D.4.(b).5 – SWH

Adjust grammar. First sentence is really awkward. Suggest:

"Significant wildlife habitats are ecologically important for the species, features, functions, and representation or amount of these values the habitats contain. SWHs contribute to the..."

5a. Modifications allowed to core deer yards: draft policy allows alteration if lots have a minimum of 90 m x 90 m and there is a subdivision agreement or notification agreement in place. This seems to make protection of the feature someone else's responsibility—whoever that is probably doesn't exist. Could the Manitoulin policy be more explicit to set out a suggested minimum % of cover to be retained?

## **Part 2. COMMENTS ABOUT SPECIFIC MAPS**

### General

In my comments below, I have identified Candidate ANSIs that should be shown if there is not already a feature, area or linkage mapped, or if the values in the ANSI are not already identified somehow.

### **Comments on the individual maps**

This big map is substantially better than the previous versions, and the switch to having the mapping be feature- and area-based rather than showing general core polygons is also a big improvement.

### Tehkummah

The large wetland between the Manitou River and Blue Jay Creek should be mapped as it is a large, continuous coastal wetland system. Currently only a narrow strip of it right at the beach is mapped. (See attached .png file.) This wetland is also missing from the Schedule D7 Plan map. This is probably due to the low accuracy of the provincial wetlands layer which couldn't tell this area is wetland.

Blue Jay Creek and its headwater wetland, and Black Creek and its headwater wetland should be shown as linkages. These two wetlands are so large, they probably should be considered features simply for their sheer size in the landscape. If these were evaluated they would certainly be PSWs. The system is really too big to be ignored.

The system is also recognized as a candidate ANSI. The boundary includes the wetland, and Blue Jay Creek, Black Creek and their headwaters. This large, connected wetland



system could be mapped as a coastal wetland in your system as it seems to meet your criteria.

Other wetlands should be shown especially the huge wetland along Rogers Creek (partly in Assiginack; again would certainly rank PSW for complexity, species diversity, SAR, etc.). Only a tiny piece of this vast system is shown, and it seems arbitrarily cut off to show wetland on only one side of the creek as if the creek were somehow a barrier rather than a connection. This makes no sense in a wetland.

#### Gordon-Barrie Island

In previous version, the large wetland on the north side of Ice Lake was shown. It needs to be put back in. It is linked to the wetlands on the 10th Line (Blanding's Turtles travel between these wetlands).

I believe the road is called the 10th Line (because it's a concession) rather than 10th Side Road. The name needs to be corrected.

Coastal wetland in Lake Wolsey extends farther south beyond the fish habitat polygon, to at least the Glen Road.

The inland wetland north of Lake Wolsey should be shown. It is continuous with the coastal wetland—this is one big red maple swamp with interconnected hydrology. (Yes, the 4th line goes through east-west, but there are culverts under the road, and the ditches contain wetland vegetation. The reason the provincial wetland layer didn't pick up on this being wetland is that it looks like some of the land connecting these wetlands was cleared. It was cleared, but the land was too wet to use. (You can see the water in the trenches that were dug.) It is not a place where someone should put a building.

The earlier version map of this township showed

Linkage is needed between Ice Lake and Tobacco Lake. If you show the OWs there (and look at the imagery), you'll see this is a corridor. Linkage is also needed between Tobacco Lake and Nameless Lake. This is a deer and wildlife movement area.

My comments in the general section at the beginning apply to many places in this township. I'm glad to see inland wetlands mapped (south of Janet Head; East Bluff; etc.), but I question their linkages to the coast, which has no coastal wetland on the shore and a steep escarpment and no major creek. There likely is a deer path up the escarpment somewhere, but probably not there. I also question the linkage from the 10th Line wetlands running through town to the bay. I looked last year at the possibility of whether there was a linkage there for turtles and concluded the wetlands were not connected and that the streets and escarpment are significant barriers. I think they would be for deer as well.

Clearly these are important wetlands that do need to be shown, but not because they are coastal wetlands.

On the southeastern part of Barrie Island, between Sturgeon Bay and Greenman Rd the coastal wetlands are actually alvars (again low accuracy in the provincial layer). I have field work there from 1998. There is a candidate ANSI there to recognize that there are a number of alvars in the area. The ANSI boundary is very general, but mapping at least a centroid dot would serve as a head's up that unmapped alvar (incorrectly mapped wetland) is present.

Alvars at the northwestern part of Barrie Island at the western end of North Line are missing. They are incorrectly shown as OWs in the Plan's D schedule mapping. Again I have field work from there and can provide data.

Candidate ANSIs:

East Bluff Talus. There is a candidate ANSI here that should be represented. Boundary there was fairly tightly mapped.

#### Central Manitoulin

Manitou River corridor from Lake Manitou (at Sandfield) to Lake Huron (in Tehkummah) should be a linkage.

Timber Bay Creek and Dewar's Creek (to the west) should be linkages.

Why were the core polygons at Timber Bay and Carter Bay deleted? They should be brown for known significant wildlife habitat. Carter Bay is also a candidate ANSI.

The wetlands and creek that run from Mud Lake to Marsh Lake (in Mills) should be mapped as a linkage. Area along Scott's Creek should be a linkage.

At Dominion Bay, the spelling of the east-west name of White Church Road needs to be fixed.

Candidate ANSIs:

Carter Bay. The ANSI boundary treats it as a complex of interconnected ecosystems. Some indication of this ANSI should be mapped to allow the MPB to be able to check whether an application is within the system that has the core values.

#### Dominion Bay Beach Ridges

ANSI boundary is very vague, but the alvars identified in this ANSI are not shown on the NHS map. Some indication of this ANSI needs to be mapped so sites can be checked prior to further development.

#### Billings

On Clapperton, the massive alvars on the northern half of the island are missing. These are mapped in the 2000 Ontario Alvar Theme Study and should have been digitized by NHIC. Seems odd to show the coastal wetlands there but not the alvars. Alvars are missing on Spillsbury Island as well.

#### Burpee-Mills

Alvars and dune shoreline are missing on the east side of Murphy Harbour. See attached .png file.

The alvars around Marsh Lake should be mapped. I have field work from this area from 2002, which should have been digitized by NHIC. See attached .png

Alvars north of Shrigley Bay are not shown (they are similar to those north of Macs Bay). I have field work from this area from 2006, which should have been digitized by NHIC.

Shrigley Creek (flows into Shrigley Bay) should have linkage that connects with Scott's Creek (farther north than you have it) which connects to the large wetlands on Union Road (in Central Manitoulin). Shrigley Bay – Marsh Lake is a candidate ANSI, but no boundary was mapped. Your mapping seems to identify the ANSI values—but the alvars are needed.

#### Other wetlands:

Wetland north of western Portage Bay is a beach ridge-fen complex with relict (inland) dunes. The whole area is recognized as a candidate ANSI, but no boundary was mapped. It should be noted on the map as a centroid. This wetland complex should be shown—if nothing else then as a linkage (more than just a line) between Portage Bay and Portage Lake.

#### Assiginack

Francis Brook should be shown as a linkage connecting the extensive Turtle Lake wetlands to the ravine below High Falls, which should also be linkage. High Falls should be shown as open space. Turtle Lake is a candidate ANSI with very unusual vegetation and floating peat mats. It should be mapped—as it was in the earlier map version.

Maclean'S Road needs to have lower case S.

#### Dawson and Robinson

The Beaver Meadow lake/wetland complex would certainly be a PSW if evaluated. It should be a feature with linkage to Silver Lake.

West of the point on the west side of Fisher Bay there are bands of core and bands of linkage. Is this to connect separate alvars? It should all be alvar (some of it is treed alvar

vegetation types). There's no point really in trying to split alvar types between feature and linkage. See attached .png file.

Alvars on east side of Carroll Wood Bay are missing. See attached .png

Spelling of Carroll Wood needs to be corrected. (See Wikipedia if you don't know who he was.)

Silverwater should be Silver Water.

Hog Lake-Maple Lake-Vidal Creek complex is a huge lake/wetland and linkage system that should be shown. It is all interconnected and connected to the coast via the creek.

Linkages to those little tiny wetlands in the mid-slope of the escarpment on the east side of Meldrum Bay seem a little hard to believe (similar to the ones at Janet Head). I'd keep the wetlands and skip the linkages.

Young Lake-Wickett Lake-Falls Lake is also a connected system with linkages between the lakes.

#### Cockburn Island

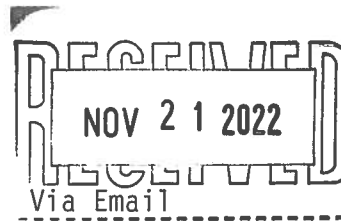
The proposed conservation reserve should be shown, to be consistent with the proposed provincial park shown in Billings. Also this is useful information.

There is true coastal wetland (on the coast) behind the dunes at Doc Hewson Bay.

November 19, 2022

Manitoulin Planning Board

Re: Manitoulin Official Plan  
Natural Heritage Mapping



Concerns of EBC

Overview: Manitoulin is geologically and biologically similar to Grey and Bruce Counties whose plan mapping is far more extensive than that suggested in the Manitoulin draft. I understand that official plans for northern Ontario have different minimum requirements, but the land and species we are logically charged to protect is the same. The time for comment has not been sufficient and “zoom” access to the meeting is not available for interested parties with a long distance to travel or who are worried about COVID in a public space. The plan review time needs to be dramatically extended to include comments and improvements like those below:

1. Lack of protection and mapping for the Niagara Escarpment. The Escarpment has been designated as one of Ontario’s Geological and Tourism highlights. There is very little represented on the maps. EBC provided to MPB the mapping by an expert when the OP was under discussion. We have represented areas which should be protected on our own internal mapping. All of this is available.
2. Earth science Area of Natural and Scientific Interest (ANSI) mapping including alvars and karsts has not been provided, although there are many, many areas worthy of representation. The municipalities and region are responsible for mapping “regional” ANSIs. Alvars of Ontario, published by Ontario Nature provides considerable info on such alvars, but a more complete inventory is required. At the very least, those areas should be protected.
3. Life Science Area of Natural and Scientific Interest (ANSI) mapping has not been provided, although there are many, many areas worthy of representation. The municipalities and region are responsible for mapping “regional” ANSIs. This should include many of Manitoulin’s grassland savannahs for example.
4. The MNR did a gap analysis to identify potential ANSI sites, but never completed the work. There is information available to the Board on these sites which should be included as regional ANSIs.
5. EBC lands and that of Nature Conservancy should be represented on the map and designated at least as “open space”.
6. Significant Woodlands are required to be mapped under the Provincial Policy Statements (PPS). A great deal of Manitoulin should qualify, but this mapping is not provided.
7. Significant Valleylands are required to be mapped under the Provincial Policy Statements. A great deal of Manitoulin should qualify, but this mapping is not provided.
8. Manitoulin is included within Ontario Lands for Life as a signature site to protect its land and shoreline in particular from excessive development. This relevant area

should be shown clearly. The shoreline must be protected from storms and surges by rules setting back development by the correct number of metres from the high water mark.

9. Manitoulin has no conservation authority. The 100-year flood plain must be clearly mapped and such areas set aside from development. There are many wetlands on Manitoulin of importance. Virtually none are shown as protected areas.
10. Considerable information is available from Ontario's Natural Heritage Information Centre. Species of importance should be protected under the PPS by designating the relevant areas with appropriate designation. Such areas could contribute to regional ANSI designations.
11. Examples: Carter Bay is not shown as having any natural heritage status. It is extremely significant.
12. EBC would be pleased to participate in a group designated to improve the quality of the present mapping. There are experts available who could make considerable contributions to the above noted problems with the mapping.

Robert Barnett  
Executive Director

**Jake**

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**From:** Jake [jaked@manitoulinplanning.ca]  
**Sent:** November 21, 2022 2:16 PM  
**To:** 'Theresa Carlisle'; 'Liv Callo'  
**Subject:** RE: FW: Manitoulin NHS comments

Hello Liv,

Thank you for your comments.

Significant Woodlands and Valleylands are not required to be mapped in islands in Lake Huron under the Provincial Policy Statement (See PPS policy 2.1.5 b) and c)). Escarpment lands are also not a required component of the NHS. Escarpments are shown in our Official Plan under Schedule E – Development Constraints, with related policies under section D.5 - Escarpment Area.

Deer Wintering area is shown on Schedule D and are protected by the applicable policies in section D.4.5.1 (included as D.4(b)5.1 as part of the draft Natural Heritage System).

Currently the Official Plan does not have a policy for Conserved areas.

Jake Diebolt  
GIS Technician  
Manitoulin Planning Board  
Email: [jaked@manitoulinplanning.ca](mailto:jaked@manitoulinplanning.ca)  
Phone: 705-282-2237

**From:** Theresa Carlisle [<mailto:mpbcarlisle@bellnet.ca>]  
**Sent:** November 21, 2022 1:48 PM  
**To:** 'Liv Callo'; 'Jake'  
**Subject:** RE: FW: Manitoulin NHS comments

Hello Liv,

I see you have copied Jake on this email.  
He will reply.  
Thanks,

**From:** Liv Callo [REDACTED]  
**Sent:** November 21, 2022 1:10 PM  
**To:** Theresa Carlisle; Jake  
**Subject:** Re: FW: Manitoulin NHS comments

Hi Theresa,  
I want to send over my comments to the Manitoulin NHS:

- Significant Woodlands, Significant Valleylands, nor Escarpment have been mapped either considered in the NHS components
- Significant Wildlife Habitat has not been included in Schedule F, have you used Deer Wintering Areas (Core Areas) for the Linkages?

As part of the NHS Policy text which says "*(...) which would protect and enable the movement of species (...) which have very important biodiversity and social value (...)*", I think you should consider at least Core Areas of Deer Wintering Areas, and Important Bird Areas (IBAs) as well.

- I know you are not using lands owned by conservation organizations as NH components. However, they should at least be mentioned in the NHS Policy text as Conserved areas.

Kind regards,

On Wed, Nov 16, 2022 at 10:25 AM Liv Callo <[liv@escarpment.ca](mailto:liv@escarpment.ca)> wrote:

Thanks, Theresa!

On Tue, Nov 15, 2022 at 5:29 PM Theresa Carlisle <[mpbcarlisle@bellnet.ca](mailto:mpbcarlisle@bellnet.ca)> wrote:

Good afternoon Liv,

The updated NHSS text and mapping (November 15, 2022) is now available on our website [www.manitoulinplanning.ca](http://www.manitoulinplanning.ca)

Please let us know if you have any questions.

**From:** Theresa Carlisle [<mailto:mpbcarlisle@bellnet.ca>]  
**Sent:** November 12, 2022 9:22 AM  
**To:** 'Liv Callo'; '[jaked@manitoulinplanning.ca](mailto:jaked@manitoulinplanning.ca)'  
**Subject:** RE: Manitoulin NHS comments

Good Morning,

Yes the updated mapping and updated text will be available on our website by end of day, November 15<sup>th</sup>, 2022, once we have it prepared for the Planning Board Members Notice of Meeting.

I will have our GIS technician contact you on Monday, when he is back.

Thank you.



**From:** Liv Callo [mailto:[livcallo@escarpment.ca](mailto:livcallo@escarpment.ca)]  
**Sent:** November 11, 2022 5:23 PM  
**To:** [mpbcarlisle@bellnet.ca](mailto:mpbcarlisle@bellnet.ca); [jaked@manitoulinplanning.ca](mailto:jaked@manitoulinplanning.ca)  
**Subject:** Manitoulin NHS comments

Good evening,

Regarding the NHS consultation process, I want to mention that the mapping for review available on your website hasn't been updated yet. Are the updated maps going to be uploaded before the next public meeting on Nov 22?

In addition, we would love to share with you our conserved areas so they can be displayed and used for the analysis/calculation of your NHS features.

Kind regards,

--

Liv Callo, [M.Env.Sc](mailto:livcallo@escarpment.ca)

Conservation Project Manager - Manitoulin, Bruce, Huron Shores

Escarpment Biosphere Conservancy

503 Davenport Road, Toronto, M4V 1B8

(416) 939-5961

[www.escarpment.ca](http://www.escarpment.ca)

## Theresa Carlisle

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**From:** Jake [jaked@manitoulinplanning.ca]  
**Sent:** November 22, 2022 4:27 PM  
**To:** 'Megan Bonenfant'; mpbcarlisle@bellnet.ca  
**Cc:** 'Esme Batten'  
**Subject:** RE: Proposed Natural Heritage System Strategy for District of Manitoulin

Hello Ms. Bonenfant,

I too must apologize for the late reply.

Our access to property information is through MPACs municipal connect, but it is often difficult to extract land ownership information.

Currently, for Natural Heritage feature information, we are using NHIC mapping for rare vegetation communities and species at risk, our Escarpment mapping from Schedule E of the Official Plan, Fish Habitat from MNRF, and wetland information from Land Information Ontario.

At this time we have not included land ownership on our Natural Heritage System mapping; however, if you wish to share the land ownership information with us it may be helpful in other instances.

Please let me know if you have any further comments, and once again I apologize for not replying sooner.

Sincerely,

Jake Diebolt  
GIS Technician  
Manitoulin Planning Board  
Email: [jaked@manitoulinplanning.ca](mailto:jaked@manitoulinplanning.ca)  
Phone: 705-282-2237

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**From:** Megan Bonenfant [mailto:~~megan.bonenfant@manitoulinplanning.ca~~]  
**Sent:** November 21, 2022 8:59 AM  
**To:** [mpbcarlisle@bellnet.ca](mailto:mpbcarlisle@bellnet.ca); [jaked@manitoulinplanning.ca](mailto:jaked@manitoulinplanning.ca)  
**Cc:** Esme Batten  
**Subject:** Proposed Natural Heritage System Strategy for District of Manitoulin

Hello Ms. Carlisle and Mr. Diebolt,

My apologies for not writing sooner but I only recently became aware that the draft Natural Heritage Strategy System policy text and mapping were available.

Nature Conservancy Canada owns a number of properties on Manitoulin and Cockburn Island that are managed for conservation. I believe, based on your draft policy text, that these properties could be mapped as linkages under the NHSS should the Planning Board wish to do so. Indeed, NCC acquires these lands with the explicit intention of protecting and linking natural heritage features. As one example, NCC acquired more than 18,000 acres on western Manitoulin in 2021 immediately north of the QEQMMM Provincial Park, creating a very large protected area corridor stretching from the southern shore to the northern shore. And on Cockburn Island, NCC owns and manages more than 60% of the lands.

I believe the Planning Board has access to property ownership and parcel mapping data to facilitate mapping privately-owned conservation lands, but please let me know if I can be of assistance in identifying NCC properties. NCC may also be able to provide mapping data of natural heritage features across Manitoulin and Cockburn (e.g., alvars, escarpment, wetlands, etc).

Kind regards,

Megan Bonenfant



**Megan Bonenfant (she/her)**

Coordinator – Conservation Biology, Midwestern Ontario

**Nature Conservancy of Canada** | Ontario Region

T: 705.499.4991

[megan.bonenfant@natureconservancy.ca](mailto:megan.bonenfant@natureconservancy.ca) | [www.natureconservancy.ca](http://www.natureconservancy.ca)

Notice: I am on the road and in the field a lot from May – October.  
Please expect delays in email responses and try my cell phone if urgent!

## Theresa Carlisle

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**From:** Theresa Carlisle [mpbcarlisle@bellnet.ca]  
**Sent:** November 22, 2022 2:23 PM  
**To:** 'Saul Bomberry'  
**Cc:** 'hrecollet@uccmm.ca'  
**Subject:** RE: Notice

Good afternoon Mr. Bomberry,

Thank you for providing us with these (additional) comments.

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**From:** Saul Bomberry [mailto:sbomberry@uccmm.ca]  
**Sent:** November 22, 2022 1:55 PM  
**To:** Theresa Carlisle  
**Cc:** hrecollet@uccmm.ca  
**Subject:** Re: Notice

Hello Ms. Carlisle,

Here are UCCMM's comments:

- We do not believe that the process the MPB has followed in developing this plan is consistent with the requirements of the Provincial Policy Statement, 2020, the current Official Plan, of the duty to consult and accommodate.
  - Specifically, the Official Plan requirement under D4(a):
    - “The Planning Board will work co-operatively with interested Indigenous communities to help inform the delineation of the Natural Heritage System....
    - “In this regard, the Planning Board and member municipalities will work collaboratively with the Indigenous communities regarding the inclusion of traditional knowledge in the establishment of the Natural Heritage System.”
  - While UCCMM did receive a notice of a public meeting last year, very little detail was provided. Given the requirements of the OP and the duty to consult and accommodate, simple notice of a public meeting is not collaboration and not consistent with the clear intent of the OP. In addition, it is difficult for UCCMM First Nations to meaningfully comment on the technical aspects of this without capacity funding. At a bare minimum the designation of specific areas as wildlife or fish habitat would take time and resources to engage with land users in the First Nations in order to properly assess impacts on the rights of the First Nations.
- This larger process concern is reflected in the substance of the draft policy which makes no mention of the importance of First Nations’ rights and land use of wildlife and fish.
- It is not consistent with the OP and existing obligations to fail to have a dedicated and robust process with the First Nations to develop the draft policy, especially where there is no technical capacity funding provided.

**Saul Bomberry, C.Tech.**  
**Lands and Resources Manager**  
**United Chiefs & Councils of Mniidoo Mnising**  
P.O. Box 275, 1110 Hwy 551  
M'Chigeeng, Ontario, P0P 1G0  
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On Sat, Nov 19, 2022 at 4:58 PM Theresa Carlisle <[mpbcarlisle@bellnet.ca](mailto:mpbcarlisle@bellnet.ca)> wrote:

Hello Mr. Bomberry,

The Public Meeting will be held on Tuesday, November 22<sup>nd</sup>, 2022 at 7:00 p.m. as scheduled.

If possible, could you provide us with any additional comments or concerns before then?

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**From:** Saul Bomberry [mailto:[sbomberry@uccmm.ca](mailto:sbomberry@uccmm.ca)]  
**Sent:** November 17, 2022 11:32 AM  
**To:** Theresa Carlisle  
**Cc:** [hrecollet@uccmm.ca](mailto:hrecollet@uccmm.ca)  
**Subject:** Re: Notice

Hi Theresa,

We're going to need more time to assess this issue and comment.

At least another 30 days from close.

Thank you,

**Saul Bomberry, C.Tech.**

**Lands and Resources Manager**

**United Chiefs & Councils of Mnidoo Mnising**

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On Tue, Nov 1, 2022 at 3:43 PM Theresa Carlisle <[mpbcarlisle@bellnet.ca](mailto:mpbcarlisle@bellnet.ca)> wrote:

Good afternoon,

A Public Meeting will be held on Tuesday, November 22<sup>nd</sup>, 2022 at 7:00 p.m. to consider the implementation of an Area-Wide Natural Heritage System Strategy (NHSS) for the District of Manitoulin.

Please find attached the "Notice of Public Meeting".

Additional information including the 'draft' text and 'draft' mapping (schedules) are available on the Planning Board website [www.manitoulinplanning.ca](http://www.manitoulinplanning.ca)

If you have any questions, please do not hesitate to contact our Office.

*Theresa*

Theresa Carlisle,  
Secretary Treasurer  
Manitoulin Planning Board  
Harbour Centre  
40 Water Street, Unit 1  
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