

FEBRUARY 26, 2021

PROJECT NO: 0876-5337

SENT VIA: EMAIL

Town of The Blue Mountains
32 Mill Street
Thornbury, ON N0H 2P0

Attention: Mr. Shawn Postma
Senior Policy Planner

RE: BLUE VISTA SUBDIVISION, TOWN OF THE BLUE MOUNTAINS
REVISED DRAFT PLAN
NATURAL HERITAGE CONCLUSIONS

Dear Mr. Postma,

In support of the revised Draft Plan of Subdivision for Blue Vista, Crozier Consulting Engineers is writing to confirm that the proposed changes to the road, lot and block layouts as shown on the proposed Draft Plan prepared by Lloyd and Purcell dated February 26, 2021 do not affect the conclusions made in the Environmental Impact Statement (EIS) (Crozier 2020) prepared by our office.


As a part of the original subdivision submission package, Crozier prepared the EIS that addressed all of the natural heritage related parts of the subject lands and the conclusions made are consistent with our responses made to the agency comments provided for all natural heritage issues raised. All issues/concerns therefore related to the natural heritage features located east and north of the Environmental Protection area noted on the plan, we believe have been resolved (see comment response matrices related to natural heritage attached for reference). The Crozier EIS report has not been updated to reflect the most recent Draft Plan layout.

We note that the revised Draft Plan layout included on the portion of the subject lands located east of the Environmental Protection area remains much the same as the original submission. Also, it should be noted that the revised Draft Plan provides for a road connection across the Environmental Protection area through to the Second Nature Subdivision which abuts the west property boundary. This road alignment indicated on the revised Draft Plan represents a shift of the alignment north from the original alignment in order to avoid ELC unit #4 (MASM1-1 shown on Figure 3, Crozier EIS, 2020) which was noted as an area of concern by the County peer reviewer (NRSI). It is our opinion that the described changes made to the original Draft Plan now represented on the revised Draft Plan will not change the findings and/or conclusions of the Crozier EIS report and the development can be supported from a natural heritage perspective. The proposed Draft Plan now only represents a total of 94 units located east of the Environmental Protection area with a through road west to connect with the existing Second Nature Subdivision which abuts the west property boundary of the subject lands. This leaves a potential for an additional 86 units for the future development phases located west of the revised Environmental Protection area.

We trust the above outline is sufficient to allow for the review of the revised Draft Plan. Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

C.F. CROZIER & ASSOCIATES INC.



Michael J. Hensel, OALA, CSLA
Senior Development Consultant

c.c. Sal Chaaya, Royalton Home
Samer Chaaya, Royalton Homes
Susan Williston, Royalton Homes
Colin Travis, Travis & Associates Inc.
Randy Scherzer, Grey County
Scott Taylor, Grey County

Enclosures: Blue Vista Comment Response Matrix – December 2020
Blue Vista Comment Response Matrix – July 2020

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Blue Vista- Comment Response Matrix – December 2020			
Comment #	Comment	Responsibility	Response
Grey Sauble Conservation Authority Comments (July 8, 2019)			
1	That a stormwater management plan be prepared for the proposal to the satisfaction of the Grey Sauble Conservation Authority for areas within the GSCA watershed to be implemented through the subdivision agreement with acceptable wording to the GSCA.		<p>Per responses provided July 2020</p> <p>Acknowledged. A Stormwater Management Report will be prepared to the satisfaction of the Grey Sauble Conservation Authority in accordance with the conditions of the Subdivision Agreement (See Section 8.1 of the Second Submission EIS).</p>
2	An Environmental Impact Study (EIS) has been completed for the proposal by Hensel Design Group. The fence row along the north portion of the property was previously mapped as significant woodland and has been removed from the significant woodland mapping in the recently approved Re-Colour Grey Official Plan. This strip of woodland does provide habitat for a number of bird species and has linkages to areas within the NVCA watershed. A portion of this woodland is proposed to be removed and a portion of the woodland would be retained on the golf course lands to the north. The impacts of this removal are not noted in the EIS.		<p>Per responses provided July 2020</p> <p>Upon review with the project Engineers (Tatham) we confirm that the majority of trees along this hedgerow strip between the golf course and the subject lands can be retained. The actual line of retention will be determined at detailed design when the grading and drainage plans are prepared with consideration for maximum retention of existing trees. We will prepare a tree retention plan to confirm specimens to be retained along the development interface and the impacts of any tree removal can be evaluated and associated compensation measures provided (See Section 4.3.3 of the Second Submission EIS).</p>
Nottawasaga Valley Conservation Authority Comments (August 14, 2020)			
General			
1	The subject lands appear to contain two intermittent streams with some steep slopes located at the south west corner of the property. The NVCA has also identified a flood risk for the watercourse however the drainage area is limited and flooding appears to be contained within the valley feature.		<p>Yes – two watercourses as per EIS report.</p> <p>Noted with respect to flood hazard confined to valley feature.</p>
2	The property falls partially within an area affected by Ontario Regulation 172/06 (the Authority's Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Regulation) where a permit is required from the NVCA under the Conservation Authorities Act prior to development.		Noted.
3	We advise that a portion of the property is regulated by the NVCA due to a watercourse (Silver Creek), an unevaluated wetland feature and associated floodplain, slope erosion hazard areas and buffers. Further, a portion of the property also contains a woodlot feature.		Noted.
Natural Heritage and Ecology – Advisory Comments			
4	The Significant Woodland discussion does not provide a clear picture of the scope of impacts to the feature from the proposed development. To summarize, it is the understanding of NVCA staff that the proposed development concept would result in a loss of 3.72 ha of woodland from the subject property (Figure 7, HDG 2019). The majority of the woodland feature proposed for removal is designated in official planning documents as Significant Woodland. The EIS and comments in the response matrix by Crozier note that the minimum area threshold for designation of Significant Woodland is 4 ha. The comments by Crozier suggest that by retaining greater than 4 ha of woodland area, the designation remains		The NVCA and NRSI have provided comments with respect to significant woodland. The attached Significant Woodland memo outlines our assessment of significant woodlands, provided as a comprehensive summary of our assessment the potential for direct, indirect and cumulative impacts to Significant Woodlands and associated ecological functions.

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	valid, with the implication being that the development would not be impacting the Significant Woodland. NVCA staff strongly recommend that the County consider this rationale to be invalid and unacceptable. Woodland loss will include a substantial narrowing of the wooded valley corridor, resulting in a variety of potential negative impacts to the functionality of the retained feature. For example, the proposed reduction in the area of the woodland feature will remove direct habitat cover for local wildlife, including species of conservation concern, and further decrease the quality of habitat for local species (area-sensitive and otherwise). Direct encroachment into the edges of the feature will increase its vulnerability to residential land use pressures post-development, e.g. human-wildlife interactions, unsanctioned trails, illegal dumping of refuse, uncontrolled spread of garden species, unauthorized tree cutting, etc.		
5	Staff maintain the position and recommendation to the approval authority (Grey County) that the development, as proposed, represents an unwarranted level of negative impact to the designated Significant Woodland feature. On this basis, staff suggest that the proposal is not consistent with the Provincial Policy Statement, or applicable Official Plan policies. While minor encroachment into the Significant Woodland feature may be reasonable and defensible, it is again recommended that the concept plan be revised to strike a more appropriate balance between feature loss and development yield.		See attached Significant Woodland memo.
6	Regarding proposed wetland encroachment within the subject lands, NVCA staff appreciate the enhanced investigation into functions associated with community MASM1-1, i.e. functionality of the identified seep feature(s). It is also the understanding of NVCA staff that the proposed valley crossing has been aligned to minimize general impacts to the valley system and associated features. Given the additional context provided, staff are not opposed to the proposed crossing location, and are willing to support the requisite removal of community of MASM1-1 under Ontario Regulation 172/06. However, staff maintain their position of no support for proposed encroachment into other wetland areas (e.g. SWDM), and associated minimum setbacks, for the accommodation of residential lots. The rationale of increased lot yield is not sufficient justification for encroachment into this wetland feature and the area of associated Significant Woodland.		Noted with respect to community MASM1-1. With respect to other wetland communities (SWDM), the results of environmental studies and impact assessment indicate no wetland functions attributable to areas of SWDM to be removed to accommodate 3 proposed lots (73, 74, 75) – i.e., no seeps, no amphibian breeding habitat). The area contemplated for removal amounts to approximately 560m ² (0.06ha) – see Figure 7 attached. Studies indicate that post-development the woodlands that the SWDM community in question form part of would not be deemed significant owing to the gap created by the required valleyland road crossing (See attached Significant Woodland memo). Wetland encroachment by residential lots is very minor and not impacting significant wetland habitat functions or an area of tree cover contributing to the area of significant woodland retained in the plan post-development.

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7	Staff reiterate previous concerns noted with regards to proposed placement of Open Space Block 136, and echo comments from NSRI (Section 6 of peer review) stating the following: "From an environmental perspective, it would be better to provide this open space block next to the retained watercourse corridor to protect a greater portion of the significant woodland and wetlands".		As per attached Significant Woodland memo and NSRI comment 6, the Town of The Blue Mountains has advised its preference for Open Space Block 136 (now Block 124) as a site for a potential active use park hence the natural heritage objective of relocating the Block has no practical relevance.
8	Crozier's response to NVCA comment 11 (within the response matrix) notes that a constraint figure depicting the extent of candidate Significant Wildlife Habitat would be included in the second EIS submission. However, it does not appear to have been included.		See attached Significant Woodland memo.
Natural Resources Solutions Inc. Peer Review Comments (August 20, 2020)			
General			
	<p>The proposed development goes against the intent of the Provincial Policy Statement (2014 and 2020), which directs development outside of natural heritage features. Typically, development is located a minimum of 10m outside of woodlands and 30m outside of wetlands, within larger buffers required within the Growth Plan area of Ontario. The Grey County Official Plan (2013, Section 2.8.4.1) prohibits development within Significant Woodlands or their adjacent lands, unless it has been demonstrated that there will be no negative impacts. The EIS has failed to demonstrate no negative impact to the woodland. This is hard to demonstrate, as close to 4ha of Significant Woodland, and thousands of trees, are proposed for removal. No negative impact may be achieved through appropriate mitigation, in the form of compensation, restoration, and naturalization. "Landscape plantings" are not sufficient. It is strongly recommended that more of the significant features within the subject property be retained.</p>		<p>The applicable PPS is 2020. The PPS is meant to be read in its entirety to ensure a balanced approach to land use planning in Ontario (Part 111). There are three foundations upon which the PPS is constructed. Environmental, Social and, Economic (Part IV). A function of the land use planning process is to ensure balanced considerations are employed in the professional review, analysis and consideration in any matter requiring a decision by a prescribed authority. Subject lands are situated in Ecoregions 6E and 7E (Section 5, Fig. 1) for purposes of Policy 2.1. Policy 2.1 intent is to not permit development or site alteration in significant woodlands "unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions" (2.1.5). Such demonstration has been provided through the EIS. As a result of such demonstration and in consideration of the balance of applicable PPS policy (as reviewed in the entirety of the PPS per Part 111) the proposal is consistent with the PPS. The peer reviewer statement fails to account for the full intent and permitted direction of the PPS and this NSRI statement is as a result a narrow, restricted interpretation and application of the PPS.</p> <p>The Grey County Official Plan (2013) reinforces a policy led planning system that recognizes the complex interrelationships among environmental, economic and other factors in land use planning (S. 1.5 (11)). The Official Plan designates the subject lands as being within a settlement area specified as a "Recreational Resort Area" (Schedule A, Map 2). As a settlement area, the intent of the Official Plan is to direct new development in a way that facilitates municipal service infrastructure by accommodating development within such a settlement area (S.2.6.7 (2)). Appendix B, Map 2 shows the subject lands as partially occupied by a "Significant Woodlands" constraint characteristic. The policy recognizes that the demarcation was a result of a desk top exercise and that additional study may be warranted (S.2.8.4). The Official Plan policy is similar to the PPS in that no development or site alteration may occur unless it has been demonstrated through an EIS that there will be no negative impact on the feature or ecological functions (S.2.8.4 (1)). As noted above, this test has been met by the EIS. The same policy does recognize that municipal public works may develop or site alter without an EIS. The policy goes on to further state that fragmentation of significant woodlands is "generally" discouraged (S.2.8.4 (4)) indicating that the Official Plan anticipates that there will be justifiable fragmentation. The EIS has demonstrated "no negative impact" contrary to the opinion of the peer reviewer. In light of this, the subject applications conform to the intent of the Grey County Official Plan.</p>

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			It is further noted that the 2019 Grey County Official Plan provides additional policy perspective on the matter of protection of natural features. The 2019 Official Plan recognizes that protection can appear contrary to other Official Plan Objectives. Section 7 states that "the County also values growth within its settlement areas which is compact in form and efficiently serviced. As a result, natural features within settlement areas will not be considered prohibitive to development ..." and, "that site specific matters will be considered when dealing with planning matters in settlement areas". The policy approach in the 2019 Grey County Official Plan reinforces the foundational approach of the PPS and that there are additional important policy directions that must be accounted for. In this case, those policy directions emphasize serviced growth in targeted settlement areas.
	The Town of Blue Mountains Official Plan (2016) discourages the loss and fragmentation of Significant Woodlands, as well as habitat and ecological functions they provide (Policy A3.2.2.5), and the same for wetlands (Policy B5.1.1). Policy B5.3.2.a prohibits development of wetlands.		Section C9.1 provides a policy direction on the purpose of a required EIS. Part of that purpose is to "make an informed decision as to whether or not a proposed use will have a negative impact on the critical natural features and ecological functions of the Town". The allowances for consideration are the results of the EIS and the EIS satisfies those allowances.
	The EIS admits that woodland to the north of the proposed road will no longer be significant. This is a further loss, beyond the proposed tree removal. The park block in the southwest corner is to be a regional park, which may be developed in the future, and as such, may also no longer be forested and should be considered under cumulative impact. Significant woodland remains to the south of the proposed road, however the woodland to the south of the subject property is highly fragmented, as it is bisected by roads, parking lot, and a spa, which is an ongoing disturbance within and adjacent to the woodland. The largest, best habitat is within the subject property, which is now proposed for development. Greater retention of the woodland should be considered, including maintaining a 100m wide corridor across the creek, and protecting the east side of the forest with a 10m buffer, which will protect the woodland from incidental impacts such as wind throw, sun scald, pets, invasive species, yard waste dumping, etc. Consideration should be given to maintaining a minimum of 4ha of forest to the north of the proposed road, so the significance of the woodland can be maintained.		See attached Significant Woodland memo.
	Wetlands should be protected with a minimum 15m buffer, other than where the creek crossing has been demonstrated as being required, recognizing it has been placed in an area where negative impact can be minimized. The impact assessment must be more robust, clearly identifying forms of impact and ways in which impact can be avoided, minimized, and mitigated.		See response to NVCA comment 6.
	Crozier has been in touch the Ministry of Environment, Conservation and Parks (MECP) with regards to Species at Risk bats, and the Ministry of Natural Resources and Forestry (MNRF) with regards to wetlands. It is recommended that the County await responses from these ministries, prior to making a decision on the development. In addition, a response should be obtained from the Niagara Escarpment Commission on these		Noted. However, as per response to Comment 4.3 below, the MNRF has not been consulted with respect to wetlands.

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	lands, as they fall entirely within the Niagara Escarpment Recreation Area.		
	To this end, a meeting with representatives from Blue Vista, Grey County, Town of The Blue Mountains, NRSI, Nottawasaga Valley Conservation Authority (NVCA), and Grey Sauble Conservation Authority (GSCA) may be helpful in developing a solution.		Noted .
	<p>Species lists do not appear to have changed from the first submission, however, this is not a significant issue. No revisions are necessary.</p> <p>The second submission of the EIS states that no data from the Ontario Dragonfly and Damselfly Atlas is available for the subject property. As the website is not functioning, a request for records of observations can be emailed to the Natural Heritage Information Center (NHIC). A response is normally received within a few days.</p>		<p>Noted with respect to species lists.</p> <p>The NHIC was contacted for Odonata records for the area. The response indicated a single record for 10km X 10km atlas square 17NK52 that covers the property and adjacent lands – Common Green Darner (<i>Anax junius</i>), S5.</p>
	<p>Development setbacks from certain features are discussed in the EIS, but not mapped. Given that large portions of woodland and wetland are proposed for removal, typical buffers are not applicable. However, buffers may play a more significant role once the proposed development is refined.</p> <p>Mapping of buffers and/or development setbacks is helpful.</p>		See attached Significant Woodland memo and attached L-1 drawing provided for discussion to address buffer, restoration and edge management.
	<p>Cumulative impacts are addressed in the July 2020 EIS. An Implementation Plan and Management Plan are not yet sufficiently addressed. These may be deferred to the Detailed Design Stage.</p> <p>As mentioned above, buffers are not address satisfactorily.</p>		Noted with respect to deferral of an Implementation Plan and Management Plan to detailed design stage.
	<p>The impact assessment provided in the July 2020 EIS, although improved from the first submission, is still significantly lacking. The EIS fails to provide sufficient evidence that there will be no negative impact to the significant woodland and unevaluated wetlands within the subject property. For instance, the 2020 EIS states that there is "no direct impact" to the significant woodland, despite almost 4ha of significant woodland being removed. Clearly this is direct impact to the woodland (i.e. tree removal). The remaining woodland will be impacted by wind throw and sun scald, as well as from the adjacent proposed subdivision. Referring these to an Edge Management Plan to be prepared later on, is not sufficient.</p> <p>Impacts must be addressed in the EIS.</p>		<p>We do not accept the premise that the impact assessment with respect to woodlands is "significantly lacking". Rather, there is disagreement among environmental practitioners with respect to what constitutes negative impact. The attached Significant Woodland memo is provided as a consolidation of the factors used to assess impacts to significant woodlands.</p> <p>Note Re: direct impact. In our assessment direct impact is used in the context to the PPS. Under the PPS you can have a direct loss of significant woodland without that constituting a negative impact. Hence when we report "no direct impact" this relates to the no negative impact test of the PPS.</p>

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NRSI Responses to July 2020 Comment Response Matrix			
3.1.1.1	Mostly addressed. Note that data on Odonates can easily be obtained by emailing the NHIC, as prompted by the NHIC website.		The NHIC was contacted for Odonata records for the area. The response indicated a single record for 10km X 10km atlas square 17NK52 that covers the property and adjacent lands – Common Green Darner (<i>Anax junius</i>). S5 – consistent with NHIC reports of no SAR or provincially rare dragonflies or damselflies (Odonata) on the property or in the surrounding landscape (Section 4.3.4 of EIS Second Submission).
3.3.3.4	Table 2, Station 1, lists bankfull width as 2000cm. Please confirm whether or not this is correct.		Bankfull width at Station 1 is approximately 1200cm (data entry error in Table 2 of 2020 EIS Second Submission). The watercourse is relatively wide in this location as it is up-gradient of the culvert under Osler Bluff Road there topography in the valley bottomlands flattens/widens.
3.4.1.6	We disagree that fish community surveys are rarely completed as part of an EIS, especially where a creek crossing is proposed. The 2020 EIS does address fish and fish habitat, indicating that no fish were observed and that fish are highly unlikely to be present, given the fish barrier at Osler Bluff Road, as well as other factors. The original comment has been sufficiently addressed in the revised EIS.		Noted.
3.4.2.1	(Note, the incorrect nocturnal survey dates are still stated in Sections 4.3.1 and 4.3.1.2).		The correct survey dates are those reported in Section 4.3.2.1 of the EIS Second Submission (July 2020), nocturnal bird surveys were completed on June 28 and June 29, 2018.
3.4.3	Addressed, although impact to significant woodlands has not been addressed sufficiently. The EIS does not satisfactorily show no negative impact to the significant woodland. Because the woodland is considered significant, it is part of Grey County's Natural Heritage System or "Natural Grey" system. Core Areas and Linkages, as mapped on Schedule C, are just a portion of this system.		See attached Significant Woodland memo. Noted with respect to Grey County's NHS.
4.3	Additional evaluation and rationale has been provided in the 2020 EIS. Correspondence with the MNRF and their response should be considered by the County in the review of the application.		The 2019 EIS included a range of field studies related to vegetation community classification, vascular plant surveys and wildlife surveys (evening calling amphibian surveys, dawn and evening breeding bird surveys, etc.) each providing data of value in evaluating wetland significance. Therefore, the significance of wetland communities has been evaluated. According to the methods of the Ontario Wetland Evaluation System (OWES) for southern Ontario (MNRF 2014), wetland units may be considered for inclusion within a wetland complex if they are located within 750m of another wetland unit included in the wetland complex and occur in the same watershed. The nearest evaluated wetland to the subject lands is the Silver Creek Wetland Complex – evaluated as Provincially Significant (PSW). The nearest unit of this significant wetland (CL7) is located approximately 1,160m to the north of the wetlands located within the subject lands. According to OWES, "wetland units less than 2 ha in size may be included as part of the complex. Such tiny wetlands may be recognized when, in the opinion of the evaluator, the small wetland pocket may provide important ecological benefit". Unevaluated wetlands on the property cover approx. 1.3ha. They are not rare (i.e., not bog or fen types), but instead are composed of habitat types typical of the area and provide no important ecological benefit defined according to provincial criteria. Therefore, the wetlands are not candidates for identification as significant on their own and following the criteria of OWES - there is no rationale for complexing the wetlands of the subject lands

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			into the Silver Creek PSW. As per OWES, the rationale for inclusion of small wetland units in a complex is provided by the evaluator with involvement of the MNRF limited to approving of inclusion of the small wetland unit in the complex (i.e., <i>"The evaluator must attach to the Wetland Data Record a brief documentation of the reasons for inclusion of those areas less than 2 ha. The reasons for recognizing any group of wetlands as a complex together with the outer boundary line should receive the approval of the appropriate MNR District or Area office."</i>). As there is no rationale for inclusion/complexing, following provincial guidelines for complexing, there is no role for the MNRF to determine eligibility for inclusion/complexing. Therefore, the MNRF was not consulted.
4.4	<p>Generally addressed.</p> <p>Bat habitat surveys have been completed, but not in accordance with the appropriate protocols, as outlined by the MNRF in their "Survey Protocol for Species at Risk Bats within Treed Habitats for Little Brown Myotis, Northern Myotis, and Tri-colored Bat" (April 2017). Among other things, leaf-on surveys were not conducted to address habitat for Tri-colored Bat.</p> <p>It is noted that a Technical Memorandum addressing Species at Risk bats is included in Appendix H of the 2020 EIS. If not already submitted to the MECP, it is requested that be done. Correspondence with the MECP and their response should be considered by the County in the review of the application.</p> <p>Additional surveys may be necessary.</p> <p>NRSI defers to the MECP with regards to SAR bats.</p>		<p>Azimuth completed detailed snag tree mapping in accordance with the MNRF's 2015 Technical Note for Species at Risk Bats – an MNRF document provided to Azimuth by MNRF Midhurst District during consultations to establish approaches to assessing bat habitat in Midhurst District. These protocols and provincial consultations have been employed by Azimuth in numerous situations within Midhurst District (that includes the subject lands) to the satisfaction of the MNRF and most recently, the MECP. Therefore, the assessment work has been completed in accordance with provincially provided and recommended protocols.</p> <p>In our opinion, leaf-on surveys for clusters of leaves potentially utilized by Tri-colored Bats are not germane to this property/proposed development. Leaf clusters of interest with respect to Tri-colored Bat are those associated with deciduous trees, oak primarily. As per Section 3.3 of the 2019 EIS, woodlands of the property do not contain oak though oak species are reported in regional forest cover. Therefore, the subject lands do not provide micro-habitat elements in the form of a potential abundance of oak leaf clusters useful to Tri-colored Bat. Regardless, we await MECP's conclusions with respect to our consultation request related to bats (as described below).</p> <p>A consultation request was submitted to the MECP on June 1, 2020 (copy provided in Appendix H of EIS Second Submission). Follow-up correspondence was submitted some 5 months later on October 29 and November 11, 2020. In reply, the MECP indicated that the <i>"file has been assigned to a Management Biologist for triaged review. Once they have completed their review they will contact you directly to discuss. Please Note: We continue to experience a large volume of requests at this time and thank you for your continued patience"</i>.</p>
5	<p>Partially completed. The EIS does not yet provide a fulsome explanation of the proposed development. For instance, the EIS does not make it clear why the hedgerow along the northern property line must be removed. In addition, different development concepts are shown on the Figures, with a total of 121 or 132 lots. This makes understanding the text difficult, as reference to lot numbers does not match up.</p> <p>Please provide a description of the proposed soakaway pits. If these are proposed for private lots, how will it be ensured that they will be maintained in order to provide their intended function into the future?</p>		<p>As per Crozier's response to GSCA's Stormwater Management Comment 2 – <i>"Upon review with the project Engineers (Tatham) we confirm that the majority of trees along this hedgerow strip between the golf course and the subject lands can be retained. The actual line of retention will be determined at detailed design when the grading and drainage plans are prepared with consideration for maximum retention of existing trees. We will prepare a tree retention plan to confirm specimens to be retained along the development interface and the impacts of any tree removal can be evaluated and associated compensation measures provided (See Section 4.3.3 of the Second Submission EIS)"</i> (EIS Second Submission – Appendix G). Section 4.3.3 of the EIS Second Submission evaluates potential linkage function inferred for the hedgerow concluding for various reasons that it does not <i>"provide significant habitat linkages/wildlife movement corridor functions of value in maintaining connectivity with natural heritage systems of the subject or adjacent lands"</i>. Therefore, the hedgerow of concern does not provide significant natural heritage functions warranting retention within the development plan. Regardless, recommendations are provided to maximize the retention of the existing tree cover within the hedgerow as part of detailed design.</p>

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			<p>The attached Figures 6 (Draft Plan overlay) and 7 (Woodland and Wetland Removal Areas) relate to the current proposed development and should be used for reference re: lot numbering, etc. The current plan includes 122 lots.</p> <p>Soakaway pits are described in correspondence to the NVCA from Tatham (May 25, 2020) as “Beyond the increased topsoil depth, additional infiltration will be provided by soakaway pits installed on each lot. Each soakaway pit has been designed to capture a specified rainfall depth (8 – 10 mm) from the rear half of the roof of each dwelling. Capturing 8 – 10 mm of rainfall in each soakaway pit equates to an annual rainfall depth of 713 – 797 mm captured. Based on these depths, 18,894 m3 of runoff from the rear half of the roof of each dwelling will infiltrate annually within the soakaway pits. That is approximately 156 m3 annually per soakaway pit. To achieve these volumes, each soakaway pit will have a surface area of 3.93 m2, a depth of 1.22 m and provide 1.92 m3 of storage. Detailed calculations of the annual rainfall depth and the total infiltration volume provided by the soakaway pits are attached for reference.”</p>
6	<p>The impact assessment, although improved from the first submission, is still significantly lacking. Although the text states that there will be no impact, the EIS fails to support this statement. Woodland and wetland removal with no form of compensation, enhancement, or restoration, is not sufficient and does not support “no negative impact”.</p> <p>Crozier's response to the original comment states that landscape plantings are recommended, however Section 9 of the 2020 EIS simply states that “Areas that are to be cleared for development but are planned to later undergo landscape plantings should implement plans that include native planting materials wherever appropriate.” This is not sufficient. There is no analysis or assessment of area compensation. Landscape plantings (e.g. street trees) are rarely, if ever, seen as a sufficient form of compensation, as these do not provide much in the form of wildlife habitat, compared to a (significant) woodland. In addition, all compensation plantings should be comprised of native species.</p> <p>Where there is insufficient room for compensation within the subject property, cash-in-lieu payments are generally made to the municipality, for compensation to be provided elsewhere. Although not yet applicable, the Nottawasaga Valley Conservation Authority has a draft ecological offsetting plan out for review. This plan should be reviewed for appropriate compensation measures.</p> <p>Additional comments on impact assessment:</p> <ul style="list-style-type: none"> - Grading of development area must match existing grades within the retained natural features. To state that this is “anticipated” is not sufficient (Section 7 of 2020 EIS). - What is the increased depth of topsoil recommended by Tatham 2020? (Section 7 of 2020 EIS). A minimum of 300mm 		<p>See attached Significant Woodland memo and response to NVCA comment 6 re: wetlands. Also see the attached L-1 drawing provided for discussion to address buffer, restoration and edge management.</p> <p>As the proposed development results in loss of wetland and woodland cover a strategy for ecological offsetting/compensation may be applicable – subject to direction from planning authorities.</p> <p>Re: Additional Comments:</p> <ul style="list-style-type: none"> • Until detailed design is complete the appropriate statement is that it is anticipated that the development will match existing grades at the interface of retained areas of natural heritage features; • Topsoil depth recommended by Tatham is on average 430mm depth within grassed areas. • Detailed design of the valley/watercourse crossing should consider the following objectives: 1) minimize road and crossing width; 2) maximize opening/span across tributary; 3) provisions for wildlife movement underneath crossing (both aquatic and terrestrial); and 4) crossing the tributary at a 90° angle.; • Noted with respect to sediment and erosion control fencing – anticipated as part of engineering submissions. <p>Noted with respect to breeding bird season – extended from July 30 to August 31. Moot as recommended vegetation clearing timing restriction avoids August to avoid impacts to bats (i.e., clear between November 1 and March 31).</p>

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Comment #	Comment	Responsibility	Response
	<p>should be recommended for the subdivision.</p> <ul style="list-style-type: none"> - General recommendations should be made with regards to the creek crossing to minimize and mitigate impacts. This should include recommendations such as minimizing road and crossing width, maximizing opening/span across tributary, providing for wildlife movement underneath crossing (both aquatic and terrestrial), crossing the tributary at a 90° angle, etc. - General recommendations are made in Section 9 of the 2020 EIS. The recommendation for construction fencing should include the recommendation for silt fencing in order to avoid erosion and sediment issues within the natural heritage features. <p>The breeding bird season extends to August 31. The reference to this should be corrected.</p>		
6	<p>Partially addressed.</p> <p>The impact assessment is still significantly lacking and does not satisfactorily support the statement that there will be no negative impacts. The EIS does not address the impacts as identified in the original comment, and it is insufficient to state that these will be addressed in a 'public and residents awareness program', when not identified in the EIS. The preparation of a public and residents awareness program does not appear to be included in the 2020 EIS.</p> <p>Intentions for the open space park block are not described in the EIS. It appears that the Town has requested these lands for a regional park block, which may include active recreation and development in the future. As such, these lands may not be suitable for inclusion or moving adjacent to the retained valleyland corridor. In addition, this future development must be considered in the EIS under cumulative impacts.</p>		<p>See attached Significant Woodland memo – includes consideration of regional park to be developed as an active recreational park (as per Town of The Blue Mountains recommendation).</p> <p>To clarify, the reference of the "public and residents awareness program" was a reference to the intention of the developer to provide a stewardship brochure as a part of purchase and sales agreements highlighting interpretation of the natural heritage features located within and adjacent to the subject lands and to provide guidance with respect to the interface and interaction with noted features abutting development and those found along community trails.</p>

Blue Vista- Comment Response Matrix – July 2020			
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Grey Sauble Conservation Authority Comments (July 8, 2019)			
Stormwater Management			
1	That a stormwater management plan be prepared for the proposal to the satisfaction of the Grey Sauble Conservation Authority for areas within the GSCA watershed to be implemented through the subdivision agreement with acceptable wording to the GSCA.	Tatham	Acknowledged. A Stormwater Management Report will be prepared to the satisfaction of the Grey Sauble Conservation Authority in accordance with the conditions of the Subdivision Agreement (See Section 8.1 of the Second Submission EIS).
2	An Environmental Impact Study (EIS) has been completed for the proposal by Hensel Design Group. The fence row along the north portion of the property was previously mapped as significant woodland and has been removed from the significant woodland mapping in the recently approved Re-Colour Grey Official Plan. This strip of woodland does provide habitat for a number of bird species and has linkages to areas within the NVCA watershed. A portion of this woodland is proposed to be removed and a portion of the woodland would be retained on the golf course lands to the north. The impacts of this removal are not noted in the EIS.	Crozier	Upon review with the project Engineers (Tatham) we confirm that the majority of trees along this hedgerow strip between the golf course and the subject lands can be retained. The actual line of retention will be determined at detailed design when the grading and drainage plans are prepared with consideration for maximum retention of existing trees. We will prepare a tree retention plan to confirm specimens to be retained along the development interface and the impacts of any tree removal can be evaluated and associated compensation measures provided (See Section 4.3.3 of the Second Submission EIS).
Nottawasaga Valley Conservation Authority Comments (October 3, 2019)			
General			
1	The subject lands appear to contain two intermittent streams with some steep slopes located at the south west corner of the property. The NVCA has also identified a flood risk for the watercourse however the drainage area is limited and flooding appears to be contained within the valley feature.	Tatham	Acknowledged. The development proposal has been prepared recognizing the applicable Natural Hazards associated with the intermittent watercourses and steep slopes; specifically, the flood and erosion hazards. The erosion hazard limit is illustrated on the Natural Hazards Plan (Drawing HAZ-2) included in the Preliminary Stormwater Management Report. The flood hazard limit is illustrated on the Open Space Flood Line Plans (Drawings FM-1 and FM-2) submitted as part of our Response to Comments for Draft Plan Application letter dated July 24, 2019 (See Section 3.4 of the Second Submission EIS)..
2	The property falls partially within an area affected by Ontario Regulation 172/06 (the Authority's Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Regulation) where a permit is required from the NVCA under the <i>Conservation Authorities Act</i> prior to development.	Crozier	Acknowledged in our submissions (See Section 3.4.1 of the Second Submission EIS).
3	We advise that a portion of the property is regulated by the NVCA due to a watercourse (Silver Creek), an unevaluated wetland feature and associated floodplain, slope erosion hazard areas and buffers. Further, a portion of the property also contains a woodlot feature.	Crozier	Acknowledged in our submissions (See Section 3.4.1 of the Second Submission EIS).

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Natural Heritage - Wetland Impacts			
4	<p>The proposed development concept would result in partial or full removal of two unique wetland communities, MASM1-1 and SWDM2-2, on the subject property. NVCA staff suggest that proposed removal of wetland communities on the subject property would not be appropriate for the following primary reasons:</p> <ul style="list-style-type: none"> • Wetland community MASM1-1 is heavily influenced by groundwater seepage and, therefore, represents an area of SWH. • SWDM2-2 is part of a broader complex of mapped Significant Woodland, and also contributes to habitat for SC species. • MASM1-1 and SWDM2-2 both provide buffer function and sources of cold groundwater discharge to a headwater tributary of Silver Creek, which supports coldwater fish communities. • Headwater wetland communities are relatively uncommon in the local area, as noted in Section 3.4.3 of the EIS, "...wetland vegetation communities are lacking in the general vicinity of the property..." 	Crozier	<p>The wetland communities MASM1-1 and SWDM2-2 are not unique wetland communities in the context of the local landscape.</p> <p>Engineering review of pre- to post-development water balance indicates that removal of MASM1-1 and SWDM2-2 will not impact the ground water discharge functions of seeps within the retained valleyland woodlands or baseflow contributions to the Silver Creek tributary.</p> <p>(See Sections 5.5, 8.1 and 8.3 of the Second Submission EIS)</p>
5	<p>The proposed development has the potential to reduce on-site infiltration, which can impact important groundwater recharge zones on the subject property. Such a change in the site-specific water balance has the potential to alter the dynamics of discharge/seepage zones which 'feed' localized wetlands, such as those identified in the EIS.</p>	Tatham	<p>Acknowledged. Refer to our response to comment 6 for additional information (See Sections 5.5 and 8.3 of the Second Submission EIS).</p>
6	<p>NVCA staff recommend that a feature-specific water balance be prepared to address potential indirect impacts to wetlands/seepage zone and recommend appropriate mitigation measures to ensure the maintenance of important functions associated with groundwater recharge/discharge.</p>	Tatham	<p>A feature-specific water balance has been prepared to quantify the reduction in runoff to the intermittent watercourses and their associated wetland features and the reduction in infiltration in the surrounding area. As a result of development, the runoff and infiltration will be reduced. To mitigate this reduction the following measures are proposed:</p> <ol style="list-style-type: none"> 1) Topsoil will be placed at approximately double the original depth across each lot and in the boulevard to increase infiltration; 2) Rear yard soakway pits will be installed to collect runoff from the rooftops to increase infiltration; 3) Roof leaders and sump pumps will be disconnected from the municipal storm sewer system and directed to discharge to grassed areas and side yard swales to increase infiltration; and

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			<p>4) Stormwater from a portion of the development will be directed to the upstream end of the intermittent watercourse during frequent minor storm events after treatment to maintain the annual volume of runoff draining to this feature.</p> <p>A Feature-Specific Water Balance Technical Memorandum detailing the water balance analysis completed and the proposed mitigation measures is enclosed for reference.</p> <p>(See Sections 5.5, 7.0 and 8.1 of the Second Submission EIS)</p>
Natural Heritage - Woodland Impacts			
7	As per Figure 7 of the EIS, the concept plan proposes to remove approximately 3.72 ha of woodland, portions of which are designated Significant Woodland in relevant lower- and upper-tier official plan mapping. These woodland areas represent a natural corridor which traverses the central portion of the property, and provide important buffering function for wetlands, seeps, and a headwater drainage feature which ultimately feeds into a coldwater fish community (Silver Creek system).	Crozier	Noted. All listed factors considered in the EIS, with specific consideration within this response matrix re: NVCA Comments 8, 9, 10, 11, 12 & 16. Adequate buffering to the wetlands, seeps and headwater drainage feature are provided by the existing vegetation to be retained within the proposed development plan. Further discussion with regards to buffers will be provided in the second submission of the EIS currently in process (See Sections 4.3.3 and 8.1 of the Second Submission EIS).
8	NVCA staff are of the opinion that the proposed significant lot encroachment into areas of Significant Woodland does not meet the objectives of the County Official Plan which states "No development or site alteration may occur within Significant Woodlands or their adjacent lands unless it has been demonstrated through an Environmental Impact Study that there will be no negative impacts on the natural features or their ecological functions". Specifically, the proposed development has the potential to negatively impact spatially-sensitive functions associated with this system by decreasing the extent of contiguous woodland cover. Lot encroachment also has the potential to introduce several anthropogenic stressors into the woodland area and adjacent lands, negatively impacting its overall function.	Crozier	<p>According to Section B5.5.2 of The Town of The Blue Mountains OP, in order to be considered significant within a settlement area, a woodland must be greater or equal to 4ha in size. The Grey County Official Plan (June 2019) similarly defines the subject lands as being settlement area in Section 3.3. The proposed development retains 5.86ha of woodland on the property – 4.63ha as Environmental Protection (associated with watercourse/valleylands); and 0.98ha as Open Space (in southwest section of property abutting retained areas of woodland on adjacent lands (i.e., Windfall Development). Considered at landscape scale, the area of continuous woodland cover retained on and adjacent to the property (i.e., those preserved within approved adjacent developments and/or retained on existing developments [i.e., The Scandinave Spa] covers approximately 12.32ha – well above the 4ha threshold for significance (See Figure 7).</p> <p>Therefore, post development - woodlands of the property and adjacent lands would be deemed significant under planning authority criteria. As discussed in the EIS and provided in responses to NVCA Comments 9, 10, 11, and 12, the proposed development does not represent a negative impact to significant natural heritage functions attributable to the Significant Woodlands (i.e., Seeps & Springs, habitat for Species Concern woodland breeding birds).</p> <p>(See Section 8.1 of the Second Submission EIS)</p>
9	In order to mitigate potential impacts to Significant Woodland from the proposed development, it is recommended that the concept plan be revised to remove proposed lot encroachment into Significant Woodland and adjacent lands, with a focus on removal of lots 78-92 and 121-126.	Crozier	The direct, indirect and cumulative impacts of the proposed lot encroachments to the Significant Woodland have been evaluated with respect to the integrity of the feature (i.e., woodland size) and potential to impact significant environmental functions attributable to the Significant Woodland (i.e., Seeps & Springs, habitat for Species Concern woodland breeding birds). The results of the impact assessment indicate no negative impact (i.e., degradation that threatens the health and integrity of the natural features or ecological functions of the Significant Woodland identified in the area by the planning authority due to single, multiple or successive development or site alteration activities).

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			Therefore, the mitigation proposed by the NVCA in the form of lot revision/removal is not required. Additional rationale to support the impacts assessment conclusion will be provided within the EIS second submission currently in process (See Section 8.1 of the Second Submission EIS).
Natural Heritage - Significant Wildlife Habitat Impacts			
10	<p>Section 4.4 of the EIS identifies potential breeding activity of two 'Special Concern' bird species, Eastern Wood-pewee and Wood Thrush, within wooded portions of the subject property. Habitat for SC species is one of several site-specific criteria for identifying Significant Wildlife Habitat (SWH), which receives protections under Section 2.1.5 of the Provincial Policy Statement. In addressing potential impacts to habitat for Eastern Wood-pewee and Wood Thrush, the EIS notes that:</p> <p>"... the forested habitats in the valleyland where the eastern wood-pewee and wood thrush were observed will remain intact".</p> <p>Contrary to the above statement, it is noted that the proposed concept plan would result in the removal of a substantial amount of the available contiguous woodland cover on the subject property. While not all woodland communities represent equally suitable habitat for these species, natural buffers between suitable habitat and human activity are equally important for maintaining habitat viability. If the proposed woodland removals were to occur, the retained woodland areas may no longer provide suitable breeding/nesting habitat.</p>	Crozier	<p>As per the EIS, Eastern Wood-pewee and Wood Thrush were identified as <u>possible</u> breeders (singing/calling males detected in only one of two dedicated breeding bird surveys, no evidence of probable or confirmed breeding) in woodland cover associated with the wooded valleylands of the south-central section of the property (i.e., species detected from bird Point Count Station #3).</p> <p>According to COSEWIC (status report 2012), Eastern Wood-pewee breeds mostly in mature and intermediate-age deciduous (often associated with Sugar Maple, elm & oak) and mixed forests (less often in coniferous forest) having an open understory and is often associated with forest clearings and edges. In Ontario, Eastern Wood-pewee territory size averages 1.76ha (COSEWIC 2012). According to COSEWIC (status report 2012) Wood Thrush breed/nest in moist, deciduous hardwood or mixed stands, often in those previously disturbed and in Ontario, prefer second-growth over mature forests. In Ontario, Wood Thrush territory size averages 2ha (COSEWIC 2012).</p> <p>The proposed development retains approximately 5.86ha of woodland cover of the property in the area where both species were detected (i.e., valleylands of the south-central section of the property south of the proposed road crossing). These retained woodlands are diverse with respect to age and composition and structure providing habitat types matching requirements of both species (i.e., Dry-Fresh Sugar Maple-White Birch-Poplar Deciduous Forest (FODM5-10), White Cedar-Hardwood Mixed Forest (FOMM7-2), Green Ash Mineral Deciduous Swamp (SWDM2-2)/Poplar Mineral Deciduous Swamp (SWDM4-5), and Dry-Fresh White Ash - Hardwood Deciduous Forest (FODM4-2). The area of suitable woodland retained on the property exceeds size requirements of both species for establishment of breeding territories. These retained woodlands are connected to woodland cover of adjacent lands to the south (i.e., the Scandinave Spa) that provide additional potential breeding/nesting habitat for both species. Therefore, as noted in the EIS - the forested habitats in the valleyland where the Eastern Wood-pewee and Wood Thrush were observed will remain intact. The proposed development retains approximately 5.86ha of woodland on the property overall and approximately 3ha in the area containing Eastern Wood-pewee and Wood Thrush. These retained woodlands form part of an overall area of continuous woodland cover of approximately 12.32ha (factoring in woodlands removed and retained by approved adjacent development). The woodlands of the property and adjacent lands provide a diversity of woodland vegetation community types/ages/openness, providing potential habitat for both species post-development. Neither species is considered "area-sensitive" (i.e., species requiring large woodland blocks for successful breeding/nesting – SWH Technical Guide Appendix C [MNR 2000] & Ecoregion 6E Criterion Schedule [MNR 2015]) and retained woodlands provide sufficient space for establishment of breeding territories by both species.</p>

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			<p>Therefore, considering the habitat requirements of these species, the scale of habitat retention within the proposed development, as well as the cumulative loss of surrounding woodland cover to approved/advancing and future developments - it is reasonable to assume that the retained woodland areas would continue to provide suitable breeding/nesting habitat for these Special Concern species consistent with the environmental objectives noted in both the Town and County Official Plans and the Provincial Policy Statement (2014 and 2020).</p> <p>(See Section 8.5.1 of the Second Submission EIS)</p>
11	<p>Retention of suitable habitat on the subject property may be important on a landscape scale, as habitat opportunities in the general vicinity are lacking, as noted in Section 3.4.3 of the EIS:</p> <p>"Natural habitats (terrestrial and wetland vegetation communities) are lacking in the vicinity of the property to the north, south, west and east. Lands to the west and partially to the south have been cleared for approved future residential development.</p> <p>Land use to the north consists of an as-built residential subdivision and golf course. Lands to east of Osler Blue Road consist of as-built rural lots in the Town of Collingwood".</p> <p>In consideration of the above, NVCA staff recommend that the EIS clearly delineate areas of candidate SWH related to these species, e.g. which vegetation communities represent potential direct and supporting habitat.</p>	Crozier	<p>Response to NCVA Comment #10 above considers impact to significant wildlife habitat/habitat of Special Concern birds (Eastern Wood-pewee, Wood Thrush) in the context of Significant Woodlands identified at landscape scale factoring in losses to area woodlands to approved/advancing developments on adjacent lands (i.e., considering "lands to the west and partially to the south have been cleared for approved future residential development"). The response includes an assessment/identification of vegetation communities of potential value as direct (i.e., nesting habitat) and supporting (i.e., foraging) habitat based on specific habitat requirements (type and scale) of both species and field data related to distribution of these species on the property (i.e., localized in vicinity of valleylands in the south-central section of the property). This is the area of candidate SWH related to these species noting that breeding evidence was limited to possible breeding only (i.e., no repeated observations defining probable breeding and no evidence of confirmed breeding). A figure identifying candidate SWH will be provided within the second submission of the EIS currently in process.</p>
12	<p>As per Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E (MNRF 2015b), 'Seeps & Springs' are regarded as a specific category/function of SWH. Table 4 in the EIS ('Significant Wildlife Habitat Assessment') notes the following in regards to 'Seeps & Springs':</p> <p>"Seeps [are] evident on the property, mostly in FODM5-10, FODM4-2, SWDM2-2 and MAMM1-2; All of these habitats will remain intact".</p> <p>NVCA staff note that the above statement omits mention of community MASM1-1, which also contains prominent seepage zones,</p>	Crozier	<p>Noted. To be addressed in EIS second submission (See Section 5.5 of the Second Submission EIS).</p>

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	as noted in a separate section (3.3.3.2) of the EIS: “Separating the two blocks of FOMM7-2 is a narrow band of cattail mineral marsh [MASM1-1] along a well-defined seep that drains down slope...”		
13	Table 4 in the EIS should be amended to acknowledge that community MASM1-1 also contains seeps and, therefore, constitutes SWH. Furthermore, given that community MASM1-1 is proposed to be removed in its entirety, the EIS should include a discussion of how this conforms to provincial policy.	Crozier	The second submission of the EIS will quantify the extent of seep zones within the subject lands in order to confirm the context for determining the seep significance and additional rationale for the removal of this feature to allow the east-west proposed road (See Section 5.5 of the Second Submission EIS).
14	NVCA staff suggest that the concept plan should be revised to retain this confirmed SWH feature (as well as a protective buffer), as such removal would not conform to Section 2.1.5 of the PPS.	Crozier	MASM1-1 is not a confirmed SWH feature given that the seep/spring function significance has not been fully evaluated. The second submission of the EIS will quantify the extent of seep zones within the subject lands in order to confirm the context for determining individual seep significance and confirm SWH status. There are no other SWH functions attributable to this wetland unit (See Sections 5.5, 8.2 and 8.3 of the Second Submission EIS).
15	Blocks 138 and 139 are designated 'walkways' which are directed toward the proposed environmental protection block and are presumably intended to be entry points for a future trail system. Development of a formal or informal trail system through Block 137 would result in further short- and long-term adverse impacts to the retained natural features and functions within. Direct and induced impacts associated with a prospective trail system should be addressed in the EIS.	Crozier	It was intended through the Impacts Assessment and Additional Recommendation sections of the EIS that potential impacts to natural heritage features resulting from desired and municipally supported pedestrian trails generally consistent with The Blue Mountains Official Plan, Transportation Schedule B-1 (June 2016) would be mitigated through fencing and on-site guidance during routing. We will confirm a protocol to be followed with Town staff that will locate the trail route and provide protection to natural heritage features during construction. EIS mitigation also recommends the development of a public and resident awareness program providing education for all who frequent the site. This program was to include information about trails (See Section 9 of the Second Submission EIS).
16	NVCA staff note that a road crossing over the central portion of the property would require encroachment/impact into identified wetland communities and mapped Significant Woodlands, and result in further fragmentation of the natural corridor which traverses the property. Therefore, it is recommended that any potentially-developable portions on the west side of subject property explore alternative access. For example, the EIS states that adjacent lands to the west of the development are 'approved' to be developed in the future; this may represent an opportunity for alternative access with reduced potential for negative ecological impacts.	All	Viewed at landscape scale, existing (i.e., Blue Mountain Village and associated development, golf course lands, residential subdivisions south of Monterra Rd.) and approved/advancing developments to the northwest and west sever habitat connections to the north and west of the property along the tributary and associated valleylands of the property. Thus, there are no options to establish viable habitat connections to distant natural heritage lands to the north and west extending through adjacent lands. Further, we note that the NVCA identified no natural corridor on or adjacent to the property as part of its forest conditions analysis related to the Blue Mountains Subwatershed (i.e. no Natural Corridors depicted on the Forest Conditions figure of NVCA's 2013 Subwatershed Health Check, Forest Conditions figure https://www.nvca.on.ca/Shared%20Documents/2013%20Blue%20Mountains%20SWHC.pdf). Therefore, establishment of a road crossing through the valleylands of the property connecting approved/advancing development to the west (via a road connection established in the approved plan) to Osler Bluff Road (Grey Road 21) does not represent a negative impact to/further fragmentation of - a viable natural corridor. Thus exploration of alternative access of the west side of the subject property is not warranted from a natural heritage/habitat connectivity perspective (See Sections 4.3.3, 8.2 and 8.3 of the Second Submission EIS).

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Natural Resources Solutions Inc. Peer Review Comments (February 12, 2020)			
General			
	Species list for all taxa observed within the subject property should be included in the appendices, such as mammals, butterflies, odonates and herpetofauna.	Crozier	Acknowledged. Second submission of the EIS will include complete listing of all taxa observed (See Sections 4.2.2.3, 4.3.1 and 4.3.3.2 of the Second Submission EIS).
	Figure 7 should include recommended buffers.	Crozier	Acknowledged. Recommended buffers will be provided in the second submission of the EIS.
	With regards to scope, the County OP (both 2013 and 2019) requires that cumulative impacts of the proposed development be addressed, and that an implementation plan be identified. These were not undertaken, but should be. The Town's OP references the need for a Management Plan, which is to include recommended buffers from natural heritage features. Buffers should be addressed in the EIS from the woodlands, watercourses, wetlands, Butternut locations, and SWH.	Crozier	Acknowledged. Recommended buffers will be provided in the second submission of the EIS (See Sections 8.1, 8.2, 8.3 and 8.5.1 of the Second Submission EIS).
	The Town's OP, Section C9.3, lists items that an EIS should address. This includes h) "not encourage the demand for further development that would negatively affect wetland function or contiguous wetland areas," and k) "not lead to a significant reduction in the forest resource or interior forest habitat in an area." In addition, the County OP states that "No development or site alteration may occur within Significant Woodlands or their adjacent lands unless it has been demonstrated through an Environmental Impact Study that there will be no negative impacts on the natural features or their ecological functions." The EIS in its current form does not sufficiently address how the proposed development will not have an impact on these areas.	Crozier	An impacts assessment with identified mitigation was identified within the EIS in Table 5 and Section 8 to address the Town's OP Section C 9.3. Further to the request made by the Peer Reviewer, additional rationale and recommendations for mitigation will be provided within the second submission of the EIS to bolster the conclusions noted (See Section 4.2.1 of the Second Submission EIS).
1.1	The description of surrounding lands should include more detail on the land to the west. Has construction begun on the property or has the development plan just been approved?	Crozier	Section 2.1. of the report provides sufficient detail of the surrounding land uses in proximity to the subject lands. The report provides description of the land uses to the North, East South and West. Regarding the West lands the report provided insight to state that these lands were currently under construction phase activities for the development of a residential community.
1.2	A list of policies that were considered as part of this study was included. In addition to the listed policies, the <i>Migratory Bird Convention Act</i> , <i>Species at Risk Act</i> , <i>Endangered Species Act</i> , and <i>Fisheries Act</i> should also be listed. These policies are mentioned elsewhere in the report suggesting that they were considered, but not included in this list.	Crozier	These relevant policies were mentioned and expanded upon in the EIS report with respect to guiding consideration of the policies/guidelines and how they related to the proposed development on the subject lands. The second submission EIS will add them to the list for purposes of clarity.

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2	The list of natural heritage policies and legislation reviewed for the EIS appears comprehensive. Several non-policy related sources are listed but are better discussed in Section 3.1.1.1, Collection and Review of Background information (see comments to that section below). The fisheries Act should also be considered as a part of this EIS as two watercourses are present. This legislation is mentioned elsewhere in the report, suggesting that is as considered but not included in this section.	Crozier	Noted. We will add a section considering the <i>Fisheries Act</i> within the second submission of the EIS (See Section 3.8 and 3.8.1 of the Second Submission EIS).
2.1	This section described the Provincial Policy Statement, but Section 2.1.1 refers to "the Act". Please clarify which Act this statement is referring to.	Crozier	The Policy Act being referenced in 2.1.1 in the HDG 2019 EIS is that of the Provincial Policy Statement 2014. Responses in this matrix and content of the second submission EIS have and will consider the PPS update that comes into effect May 1, 2020 (See Sections 3.0 and 3.1.1 of the Second Submission EIS).
2.2	Grey County's OP was updated in 2019, but the 2013 OP applies to this application. The specific version of the OP being referred to should be stated in this section. This section should also summarize Grey County's specific EIS requirements to ensure these are met.	Crozier	The Grey County OP being referred to in this EIS is that of 2013 version, given that the 2018 version had not yet been adopted by the Province. The Grey County EIS guidelines in section 2.8.7 of the 2013 Grey County OP were reviewed prior to this EIS study. These requirements were then cross-referenced and combined with the ones listed in the Draft Grey County OP (2018) and the Local OP of the Town of Blue Mountains to determine the Terms of reference that guided this EIS process for the subject lands. We note that the Grey County OP was adopted by the province for use in June 2019 after the EIS had been prepared. Reference to the Grey County OP (2019) will be included within the second submission of the EIS, however the principles of EIS requirement have not significantly changed (See Sections 3.0 and 3.2 of the Second Submission EIS).
2.3	The specific version of the OP being referred to should be stated in this section. This section should also summarize the Town's EIS requirements to ensure these are met.	Crozier	The Blue Mountains OP being referred to in this EIS is that of the 2016 version as noted in Section 3. The Blue Mountains EIS guidelines were reviewed prior to this EIS study. These requirements were then cross-referenced and combined with the ones listed in the County OP to determine the Terms of Reference through pre-consultation that guided this EIS process for the subject lands (See Sections 3.0 and 3.3 of the Second Submission EIS).
2.4	Section 2.4.1 Relevance to the Development Proposal should state that a permit is also required from NVCA when undertaking interference with a watercourse or wetland, or developing adjacent lands.	Crozier	Section 3.4.1 of the Second Submission EIS states that due to the subject lands being within the NVCA regulated area and due to the development proposals nature on the subject lands the requirement for an EIS was understood. Completing an EIS was determined through consultation with the NVCA associated with the requirement of receiving a permit from the NVCA for the proposed development. Anytime regulated Conservation Authority areas are involved it is a requirement to submit and consult with the CA and complete any necessary processes relating to permit issuance from the CA. It is acknowledged that a permit will be required.
2.6	This section states that the NHIC was consulted as to the listed species within a 1km grid surrounding the subject lands. This is a good resource, but all sources of background information should be consulted for SAR records within the vicinity of the subject property. This includes all sources that are mentioned in comments for Section 2.0. The MECP must be contacted with regards to SAR occurrences on or within the vicinity of the subject property and correspondence with the MECP should be appended to the EIS. In addition to the SAR encountered during site visits, SAR with candidate habitat within the subject property, if any, should also	Crozier	Acknowledged. A Species at Risk assessment will be completed following the MECP guidance document - Client's Guide to Preliminary Screening for SAR (May 2019) as part of preparing the EIS second submission. At the time of preparing the EIS, access to MECP contacts was in flux and the ability to secure information was hampered. Consultation with the MECP is ongoing (See Sections 3.6, 4.1.1 and 4.1.2 of the Second Submission EIS).

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	be considered here. See comments under section 3.1.1.1 with regards to SAR screening.		
3.1.1	Sections 3.1.1.1 to 3.1.1.3 appear to deal with background resource material for vegetation and wildlife. As such, it is suggested the title to Section 3.1.1 be renamed to avoid confusion.	Crozier	Section 4.1.1 is titled "Collection and Review of Background Information". This sections contents discussed relevant review of historically recorded findings relating to the subject lands. Section 3.1.1.3 is titled "Field Reconnaissance and Inventories". This sections contents discussed and presented the results from the current field studies (section lists dates in report) undergone by hired consultants to complete the terms of this EIS (See Sections 4.1 and 4.1.1 of the Second Submission EIS).
3.1.1.1	The list of documentation and other sources reviewed for natural environment data includes two resources pertaining to Life Science Areas of Natural and Scientific Interest (ANSI). ANSIs were not addressed in the EIS. Please clarify if there are any within the subject property or vicinity that should be addressed. NRSI recommends the Reptile (Ontario Nature 2019), Mammal (Dobbyn 1994), Butterfly (MacNaughton et al. 2019), and Odonate (NHIC 2019) wildlife atlases be reviewed as well. Aquatic Species at Risk (SAR) data can be obtained from the Department of Fisheries and Oceans (DFO) online mapping tool (DFO 2019). The Ministry of Environment, Conservation and Parks (MECP) should be contacted with regards to Species at Risk (SAR) occurrences. The results of background review should be presented in the EIS. All SAR with occurrences within the vicinity of the subject property as shown in wildlife atlases or NHIC database and provided by the MNRF or MECP should be listed. A screening exercise should be completed to assess the potential for reported SAR to occur in the subject property by cross-referencing the preferred habitat for reported SAR against habitats known to occur in the subject property. This exercise should be used to scope field studies.	Crozier	Section 3.1.1 of the EIS states that the review of the Life Science Areas of Natural and Scientific Interest in Site District 6-6 - A Review and Assessment of Significant Natural Areas in Site District 6 -6 (Hanna 1984) was completed. The identification of No ANSIs were found on site. Section 3.1.1.1 also presented the results of the background review in the front paragraphs of the section then moved into the sources that this information came from in the second half. No SAR were identified through the background review and is why nothing is listed (See Sections 3.1.1, 3.6, 4.1.1 and 5.6.1 of the Second Submission EIS).
3.1.1.3	This section states that soil data was noted and recorded during all site visits. If soil profiles were assessed, it is requested that the ELC data sheets, including soil sheets, be appended to the EIS. The vegetation species list for the ELC community #14 Fresh-Moist Poplar Deciduous Forest (FODM8-1) contained several wetland indicator species but was not identified as a wetland community. A soil analysis should be completed in this community to assist in identifying this vegetation community. Groundwater levels in this area are reported to be very shallow (Peto MacCallum Ltd. 2018).	Crozier	Soils data were collected by the Crozier team in February and March 2020 (hand augering) and results were analysed along with site condition and vascular plant data presented in the 2019 EIS according to the methods of the Ecological Land Classification system for southern Ontario. Results indicate that Polygon #14 is appropriately classified as a Fresh-Moist Poplar Deciduous Forest (FODM8-1). Results and analysis will be presented in the EIS second submission (See Sections 4.2.2.1 and 4.2.2.4 of the Second Submission EIS).

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3.3.3.1	<p>Vegetation inventories occurred during appropriate seasons and a suitable level of survey effort was conducted. Figure 3 shows the Ecological Land Classification (ELC) communities. It would be helpful if Polygon #3 was divided to show the two communities it encompasses (i.e. SWDM2-2 and SWDM4-5). The description of aquatic features is fairly vague throughout the EIS and is included within report sections describing terrestrial features. It is recommended that the watercourses be described in one section devoted to aquatic features. The EIS mentions in several sections that there was no flow in the "northern portion" of the tributary. Was no flow observed on all of the site visits throughout the year or only during one site visit? On the site visit that occurred January 20, 2020, seepage areas were observed within the Fresh-Moist Poplar Deciduous Forest (FODM8-1; polygon #14 on Figure 3) in close proximity to the northern property boundary. The tributary appears to extend beyond that which is mapped within the EIS. The minimum mappable unit according to the Ecological Land Classification system for southern Ontario is 0.5ha. Distinct vegetation units smaller than 0.5ha may be mapped as inclusions to a larger vegetation type, however units that are smaller than 0.2ha are generally ecologically less meaningful and are often included within a larger vegetation community type (i.e. not mapped separately unless ecologically significant). Using the 0.5ha or 0.2ha criteria will likely have implications on the vegetation community mapping of this subject site.</p> <p>The woodland (i.e. dripline) and wetland boundaries should be delineated and surveyed in the field. Conservation Authority and municipal staff should be given the opportunity to review the boundaries in the field. The surveyed boundaries should be included on EIS mapping.</p>	Crozier	<p>The ELC mapping of the 2019 EIS is quite detailed and fine scaled. Polygon #3 is long and narrow defining wetlands in the base of the valley associated with the watercourse. Subdividing the polygon to show areas of wetland dominated by ash (SWDM2-2) versus poplar (SWDM4-5) interjects a level of detail not germane to the classification of vegetation communities as both are deciduous swamp communities, ash and poplar are common within both community types, neither community type is rare and both community types are common locally. Mapping and description of Polygon #3 to be left as is. Point taken with respect to watercourse description - to be addressed in EIS second submission. See above for assessment of Polygon #14. Woodland limits are often defined based on air photo interpretation with no dripline staking/survey by an OLS or review by CA or municipal staff - particularly in situations where encroachments into woodlands create new edge (as per development west of the valley) or where requirements for edge management/buffer plantings are contemplated (as with this proposed development). Therefore we do not consider it necessary to stake driplines, recognizing that the requirement to do so would follow direction of the planning authority as applied to other developments approved recently in the area (See Sections 4.1.5, 5.5 and 8.7.1 of the Second Submission EIS).</p>
3.3.3.4	<p>All figures in the EIS show one existing watercourse and one existing intermittent watercourse, but the aquatic text in the EIS only refers to one intermittent watercourse. These two watercourse features should be discussed separately throughout the EIS. This section does not specifically support the determination of intermittent watercourses, although it does suggest it. If both watercourses were identified as intermittent, all maps within the EIS should be updated to reflect this, however given the presence of significant seepage areas reported within the EIS and observed January 20, 2020, this would tend to support permanent flow.</p> <p>There is no indication of if or when the aquatic habitat was assessed and no methods for aquatic habitat characterization were provided. A full aquatic habitat characterization of both tributaries, from the upstream extent (e.g. where/how does the feature begin?) to the downstream extent (e.g. description of culvert) should be completed to describe the overall morphology and how flows change throughout the subject property from upstream to downstream.</p>	Crozier	<p>Additional watercourse descriptions and culvert assessment will be provided in the EIS second submission (See Section 4.2.2.4 of the Second Submission EIS).</p>

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3.4.1.1	Although the specific weather conditions during surveys is not noted in the EIS, it is stated that they were conducted under "suitable weather conditions (low wind, little or no precipitation)". It is stated that "the breeding bird point counts (8 stations) followed standard MNRF protocols," but the Ontario Breeding Bird Atlas protocol was also mentioned. It is requested that the protocol used be stated and referenced here.	Crozier	Section 4.3.1.1 in the report states "The inventories included two dawn breeding bird surveys (at 8 point count stations) on June 8 and June 22, 2018 following the Ontario Breeding Bird Atlas (OBBA) inventory protocol (See Section 4.3.1.1 of the Second Submission EIS).
3.4.1.2	Nocturnal bird surveys were conducted during the appropriate time of the breeding season (within one week of the full moon phase). It is requested that the location of the point count stations be shown on a map as they are not currently displayed on any maps within the EIS. See comments with regards to timing in Section 3.4.2.1 below.	Crozier	Figure 4 will be revised in the EIS second submission to show the location of nocturnal bird survey point count station location (See Section 4.3.2.1 and Figure 4 of the Second Submission EIS).
3.4.1.6	Clarify "of a duration" when describing water depths. The EIS should describe details on the downstream culvert under Osler Bluff Road. Does the culvert act as a barrier to upstream fish movement into the subject property? The term "littoral zone" is somewhat confusing since it is more typically associated with shoreline habitat along lakes and larger rivers. Please clarify. Why was a fish biomass inventory not undertaken? Please provide rationale here.	Crozier	The culvert under Osler Bluff Road was inspected in February 2020 by ecologists from Azimuth. The downstream end is perched under low flow (i.e., winter) conditions. Under high flows the culvert may not be perched but velocity through the culvert would pose a barrier to fish passage. Therefore, the Osler Bluff Road culvert poses a barrier to upstream fish movement. Littoral zone was utilized to define characteristics of habitat adjacent to the watercourse as opposed to habitat generally present within the valley wetlands. As discussed elsewhere, the EIS second submission will provide further description of the watercourse and related fish habitat functions. Fish biomass surveys are rarely completed as part of an EIS. The fish community of Silver Creek to which the tributary is connected is well studied and defined from species composition and thermal regime perspectives. For the reasons noted above, a biomass inventory unwarranted (See Sections 4.1.4 and 4.2.2.4 of the Second Submission EIS).
3.4.2	It is recommended that a section be included for Odonates and Butterflies in which species observations should be discussed. Monarch, a Species of Conservation Concern, was observed in the subject property.	Crozier	Odonate (Dragonfly, Damselfly) and Butterfly surveys are rarely completed as part of EIS studies completed in Simcoe and Grey Counties and are typically not recommended as part of terms of references established by conservation authorities for EISs completed in these areas (Azimuth is aware of none in Simcoe or Grey). The SAR assessment proposed as part of the EIS addendum will identify potential for END, THR, SC or provincially rare Odonates and Butterflies (i.e., S1, S2, S3 or Sx) locally and will evaluate implications of observation of Monarch on-site from a SWH/Habitat of SC species perspective (See Section 4.3.3 of the Second Submission EIS).
3.4.2.1	Observations of birds made outside of breeding and crepuscular bird surveys are not included in the species list (Appendix E). It should be stated if any regionally, provincially or federally significant species were observed during non-targeted field surveys. The numbers spelled out do not match the numbers in brackets in this section (e.g. "forty (37) bird species..."). Please clarify. Nocturnal bird survey stations should be shown on Figure 4. Section 3.4.1.2 Nocturnal Wildlife Survey states that surveys were completed on June 29 and July 29, 2018, but Section 3.4.2.1 states that surveys were completed on June 28 and June 29, 2018. Please confirm the correct survey dates. The surveys were completed following the MNRF (2015) protocol for Eastern Whip-poor-will (<i>Antrostomus vociferous</i>) and Common Nighthawk (<i>Chordeiles minor</i>), but the survey technique is not consistent with the survey protocol recommended by Bird Studies Canada (BSC 2018), which states that surveys for Common Nighthawk should start one	Crozier	Reporting inconsistencies as noted will be corrected in the EIS second submission. Nocturnal bird surveys were conducted on June 28 and June 29, 2018 as per Section 3.4.2.1 of the HDG 2019 EIS. Conservation rank information is provided on the bird list in Appendix E of 2019 EIS. Point noted with respect to Common Nighthawk survey timing noting further that NRSI is not recommending Common Nighthawk surveys be completed for this site and is accepting of the results of the nocturnal bird surveys completed with respect to Eastern Whip-poor-will. Location of nocturnal bird survey point count station to be shown on updated figures within the EIS second submission (See Figure 4 and Section 4.3.1 of the Second Submission EIS).

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	hour before sunset and end 30 minutes after sunset. Surveys conducted for Common Nighthawk near midnight will not yield this species. It is recommended that Crozier conduct Common Nighthawk surveys following the Bird Studies Canada (BSC 2018) protocol in the future, however we will not recommend these surveys be repeated on this site, given that the MNRF protocol was followed.		
3.4.2.3	This section states that the majority of amphibian calls were restricted to the intermittent creek valley features, with American Toad (<i>Anaxyrus americanus</i>) "more prevalent in the mixed meadow features (MEMM3)". According to Table 3, American Toad was observed from monitoring station 3, which is close to Osler Bluff Road. Please clarify from which MEMM3 community the toads were calling. Is ponding present within the meadow habitats that provides breeding habitat for the toads?	Crozier	To clarify, Figure 5 identifies the point count calling station locations for the completed amphibian calling surveys and Figure 3 identifies ELC unit mapping locations. Of the two identified MEMM3 Units on the subject lands, the one within which the American Toad calling was detected to be more prevalent in during the calling surveys completed at station 3 is that of ELC Unit #16 classified as MEMM3. As per Section 3.4.2.3 and Table 3 of the 2019 EIS, calling intensity detected on site was below thresholds for identification of SWH function with respect to amphibian breeding and American Toad is not a species of conservation concern (See Section 4.3.2.3 of the Second Submission EIS).
3.4.3	Due to the approved developments to the west and south, much of the surrounding natural environment has already been approved for removal, reducing potential habitat connectivity. The remaining natural heritage features within the subject property, especially along the tributary, therefore may become more important, as they are the sole remaining connection between habitats further north and to the east/southeast. The woodland within the subject site is part of the County's Natural Heritage System, as it was included as a Significant Natural Feature (Significant Woodland). In addition, the Town of Collingwood Natural Heritage System should be considered, as it lies across Osler Bluff Road from the subject site. The habitat connectivity and linkage potential of the natural features within the subject lands should be reconsidered.	Crozier	Viewed at landscape scale, existing (i.e., Blue Mountain Village and associated development, golf course lands, residential subdivisions south of Monterra Rd.) and approved/advancing developments to the northwest and west sever habitat connections to the north and west of the property along the tributary and associated valleylands of the property. Thus, there are no options to establish viable habitat connections to distant natural heritage lands to the north and west extending through adjacent lands. Further, we note that the NVCA identified no natural corridor on or adjacent to the property as part of its forest conditions analysis related to the Blue Mountains Subwatershed (i.e. no Natural Corridors depicted on the Forest Conditions figure of NVCA's 2013 Subwatershed Health Check, Forest Conditions figure [https://www.nvca.on.ca/Shared%20Documents/2013%20Blue%20Mountains%20SWHC.pdf]). Therefore, though the valleylands are protected (required road crossing notwithstanding) from a landscape perspective they do not provide significant habitat connectivity/linkages. Interestingly, the woodland within the subject lands is not a part of the County's noted Natural Heritage System (OP Schedule C, June 2019). The issue of habitat connectivity and linkage potential of the natural features within the subject lands has been considered in the context of Significant Woodlands (See Sections 4.3.3 and 8.1 of the Second Submission EIS).
4.1	This section should provide rationale why the valley land is not considered significant. The watercourse within the subject property is a tributary to Silver Creek, which is a significant valley land.	Crozier	Assessment of valley land significance to be provided in second submission EIS (See Section 5.1 of the Second Submission EIS).
4.2	The mapping of significant woodlands by the County should be refined using the ELC mapping presented in the EIS. For example, in Figure 7 the Cattail Graminoid Mineral meadow Marsh (MAMM1-2) is currently mapped as significant woodland.	Crozier	Further consideration of significant woodland will be addressed in the EIS second submission (See Section 5.2 of the Second Submission EIS).
4.3	Natural Heritage Information Center (NHIC) mapping indicates the presence of an unevaluated wetland in the subject property. Has the significance of wetland communities within the subject property been evaluated? This assessment should be included in the EIS. The MNRF	Crozier	The 2019 EIS included a range of field studies related to vegetation community classification, vascular plant surveys and wildlife surveys (evening calling amphibian surveys, dawn and evening breeding bird surveys, etc.) each providing data of value in evaluating wetland significance. Therefore, the significance of wetland communities has been evaluated. According to the methods of the Ontario

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	should be contacted to confirm the status of the wetlands. Rationale should be provided as to why the wetlands within the subject property are or are not provincially significant.		Wetland Evaluation System (OWES) for southern Ontario, wetland units may be considered for inclusion within a wetland complex if they are located within 750m of another wetland unit included in the wetland complex and occur in the same watershed. The nearest evaluated wetland to the subject lands is the Silver Creek Wetland Complex – evaluated as Provincially Significant (PSW). The nearest unit of this significant wetland (CL7) is located approximately 1,160m to the north of the wetlands located within the subject lands. The wetlands of the property are not rare (i.e., not bog or fen types), they are composed of habitat types typical of the area and for the most part are protected from development within the valleylands. Therefore, the wetlands are not candidates for identification as significant on their own and following the criteria of OWES - there is no rationale for complexing the wetlands of the subject lands into the Silver Creek PSW. The MNRF will be consulted to confirm wetland status (See Sections 3.1.1 and 5.3 of the Second Submission EIS).
4.4	Field studies were not carried out to accurately evaluate the presence or absence of Bat Maternity Colony SWH. The MECP should be consulted with regards to bats as specific bat surveys were not undertaken. As noted in previous sections of the EIS, seeps were documented in the MASM1-1 community as well, in addition to the others listed in Table 4. The SWH criterion states that any forested area (with <25% meadow/field/pasture) within the headwaters of a stream or river system is the SWH (MNRF 2000). The MASM1-1 community is approximately 0.08ha in area, and would be considered as part of the woodland through conventional woodland mapping guidelines. This area contained many seeps when observed during the site visit on January 20, 2020. As such, the EIS should reconsider whether this unit qualifies as Seeps and Springs SWH. SWH for Eastern Wood-pewee and Wood Thrush is identified as candidate within the subject property as no probable or confirmed breeding evidence was observed. It is stated in the EIS that "the forested habitats in the valley land where the eastern wood pewee and wood thrush were observed will remain intact", however the development plan shows that a significant portion of the treed features near observation locations is proposed for removal. Please clarify and address through the impact assessment as necessary. Monarch is a species of Special Concern, and as such, its habitat is protected as SWH for special concern and rare wildlife species if it meets certain criteria. Table Q-3 in the MNRF Significant Wildlife Habitat Technical Guide (MNRF 2000) shows the evaluation criteria for species and habitats of conservation concern. It is recommended that the candidate habitat identified in the subject property be evaluated using these criteria to determine if it would qualify as SWH. Monarch should be addressed in the impact assessment.	Crozier	It should be noted that bat surveys have been undertaken and the results will be documented in the EIS second submission. Other points raised with respect to SWH functions will be addressed in EIS second submission (See Sections 3.6, 5.5 and 8.5.1 of the Second Submission EIS).
4.6	This section should be correctly identified as referring to the Endangered Species Act. As previously mentioned, the MECP must be consulted in regards to any potential SAR. NRSI agrees that a Butternut health assessment is not required as development is proposed to occur further than 50m from the trees. Figure 2 includes the location of Butternut trees, but these are not included in the map legend. The EIS states that the	Crozier	Title identification acknowledged. Figure 2 has the locations of the Butternut trees present. Legend will be updated within the EIS Addendum to show the Butternut location symbol. Consultation with the MECP regarding SAR acknowledged (See Section 4.1.4 of the Second Submission EIS).

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	forest/other wetland features in the intermittent creek valley will remain intact, but the proposed development plan shows that a portion of this feature will be removed. Please clarify. This section states that there are three bat species listed as endangered under the ESA. Eastern Small-footed Myotis is also listed as endangered under the ESA, however the subject property would not provide suitable roosting habitat for this species. Due to the proposed removal of candidate SAR bat habitat, the MECP needs to be consulted in order to determine details regarding any required assessments and permitting. The woodland features should not be removed until MECP approval has been received, as they have the potential to provide habitat for SAR bats.		
4.7	All figures in the EIS show one permanent watercourse and one intermittent tributary. The text on fish habitat only mentions one intermittent watercourse. Please clarify. The results of the aquatic habitat assessment should be used to determine if either of the watercourses contain fish habitat or suitable habitat for any listed species.	Crozier	As indicated elsewhere in this comment matrix, the EIS second submission will provide further descriptions of the watercourse/aquatic habitat functions (See Section 4.1.4 of the Second Submission EIS).
5	Please summarize pertinent information from the supporting documents in the EIS, including results of the Functional Servicing, Storm Water Management, and Geotechnical reports that pertain to the natural heritage assessment, evaluation, and impact assessment. This section mentions general buffers for the subject property. Specific buffer widths for each natural heritage feature, and rational for how the recommended width protects the feature and its function, should be stated and mapped on Figure 7. Appropriate buffers should be provided for the watercourse, wetlands, woodlands, and SWH.	Crozier	Reference to Functional Servicing, Storm Water Management was noted and direction to these reports was provided. The EIS second submission will provide a summary of findings from Engineering reports and rationale for recommended buffers.
6	The impact assessment is significantly lacking. The potential impacts on hydrology should be elaborated and details of the water balance assessment should be included here. Please present the results of study team reports and determine if there will be impacts to surface flow, groundwater, water balance to the retained wetlands and watercourses, and/or water quality. Provide the impact assessment. It is stated that the impacts from removal of vegetation will be mitigated by landscape plantings. However, landscape plantings often consist of non-native species and are not effective compensation for the ecological function of natural features and the habitat they provide. Figure 7 shows that the entire MASM1-1 polygon is proposed for removal, but the impacts of removal of wetland communities is not specifically addressed nor are effective mitigation measures identified. According to Figure 7, a portion of polygon #10, the treed hedgerow along the northern property boundary is also proposed for removal but this is not listed in Table 5. Potential impacts and proposed mitigation should be included for this	Crozier	The SWM plan was prepared by C.C. Tatham (Stormwater Management Report, February 2019), post development runoff (quality and quantity) will be managed in such that off-site flows will not exceed pre-development rates and water quality objectives are met. As the EIS report states: the removal of vegetation on the subject lands will be mitigated by proposed landscape plantings. These landscape plantings are recommended within the EIS in Table 5 and in Section 7, Additional Recommendations. Areas that are to be cleared for development but are planned later to undergo landscape plantings should implement plans that include native planting material. This will be specified during the detail design stage of the project. Issues raised with respect to END bats, Butternut, Significant Woodland and SWH functions will be addressed in the EIS second submission (See Sections 4.3.3, 5.5, 8.1 and 8.3 of the Second Submission EIS).

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	community as well. No details on the impacts of removal of significant woodland has been addressed in the impact assessment. The potential impacts on SAR bats or Butternut are not addressed. Potential indirect impacts to wildlife could be related to noise or dust associated with construction activities and unnatural lighting resulting from the development. Potential impacts to confirmed and candidate SWH are not addressed. The potential impacts to habitat that has been confirmed Seeps and Springs SWH and SWH for special concern and rare species should be addressed. According to the development plan, the only seeps that will be retained are those located within forest ELC communities, as seeps located within wetland communities will be removed in their entirety. The potential impacts of the removal of seepage areas on the water balance and impacts to the watercourses should be described.		
6	<p>The potential impacts on the watercourses has not been addressed and an appropriate evaluation of the watercourses has not been completed. More detail on the existing conditions of the watercourses are required to identify and evaluate potential impacts to watercourses regarding the proposed crossing. The proposed outfall from the SWM pond must be addressed in the impact assessment. What is the purpose of Blocks 138 and 139? It appears these are trail connections. The EIS should address the impact of trails.</p> <p>Block 136 is an open space Block. The EIS should describe its intended use and protection. From an environmental perspective, it would be better to provide this open space block next to the retained watercourse corridor to protect a greater portion of the significant woodland and wetlands. The impact assessment does not sufficiently address anticipated impacts from residents living next to the retained natural heritage features (e.g. trails, dumping), wind throw, or other typical impacts from residential neighbourhoods adjacent to or, in this case, within natural heritage features.</p>	Crozier	Additional information about watercourses and culvert has been collected and will be addressed in the EIS second submission. Block 124 is intended to be an open space block to be left in a naturalized state contiguous to the open space block located within the subdivision to the south. It should be noted that the Impact Assessment notes the development of a public and residents awareness program that will speak to potential impacts from residents and the importance of preserving retained habitat (Table 5).