

Response to 70-76 Edgehill Drive Residential Townhouse Development

Submitted by Frances McGill

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Please accept this as my formal response to the development plans for 70-76 Edgehill Drive, Barrie, Ontario. I am concerned with the outdated and incomplete Environmental Impact Study prepared by Azimuth Environmental Consulting, Inc., for this site and have some suggestions and observations I wish to submit.

Environmental Study Date

Azimuth acknowledges that the land contains Significant natural Heritage Features, but declares that the impact by the proposed development would be minor and mitigable (source: letter to Stephen Naylor, Innovative Planning Solutions, dated May 15, 2018) . However, the date when the study took place was in 2012 – and does not currently reflect the environment and wildlife that exists on this site as of 2019. This report also was only conducted for 76 Edgehill drive and did not consider 70 Edgehill drive.

The report also states that “according to Section 2.1.4 of the PPS, development and site alteration shall not be permitted in “Significant wetlands in Ecoregions 5E, 6E (subject property) and 7E,” and Section 2.1.5 of the PPS states site alteration shall not be permitted within “Significant woodlands in Ecoregion 6E and 7E; and Significant wildlife habitat, (Azimuth Environmental Consulting Inc., 2018, p.1)” nevertheless the developer is still planning to proceed with their development.

EIS Requirements

Part of the proposed development is located in proximity to Natural Heritage Resource (NHR) areas, which are designate Level 1 and Level 2. Level 1 represents critical components of the NHR network and the City of Barrie OP specifies that NO development shall be permitted within these areas. Level 2 represents significant components of the NHR network, with the City OP stating NO development if negative impact can’t be mitigated.

Azimuth Environmental Consulting states that an EIS will be required to be completed for any development or site alteration in or within 120 meters of an area identified as Level 1 or Level 2 – yet their report was done for a total of one hour over two mornings June 12 & 27, 2012, and

only covered 76 Edgehill Drive in an attempt to identify Species At Risk (SAR). I submit that this is not enough time to determine SAR in this area and in fact species that are considered SAR were missed. As a long time home owner beside the ravine on the northern portion of the subject land I have personally seen SAR within the ravine as well as many different types of significant wildlife.

Lack of Identified SAR

I am concerned that the dated EIS from 2012 is being used to evaluate a property in 2019 that contains SAR not identified in the original report from 2012, and is based on “assumptions” that if they weren’t seen then, “there is no expectation that current usage of the property by birds should have changed” (Azimuth Environmental Consulting Inc., 2018, p. 9). I have personally seen red headed woodpeckers, identified as SAR in the ravine beside my house. Two half-hour periods over two days in June 2012 are simply not sufficient to identify SAR in this area.

No Wetlands Evaluation

Azimuth Environmental Consulting Inc. states that they have not evaluated the significant wetlands during field investigations because it “was not visible from the property boundary.” Just because it’s not visible doesn’t mean it will not be impacted by the severe changes to the landscaping proposed on the land.

They also state “From a natural heritage perspective, it is highly unlikely that this wetland is providing wildlife habitat function, primarily due to its location directly beside a major highway.” To make these “assumptions” is outrageous and erroneous.

Significant Wildlife Habitat

As someone who has lived in this area for over ■ years, I can attest to the abundance of wildlife that calls this area home: white-tail deer, wild turkey, foxes, raccoons, rabbits, skunks, squirrels, moles, ground hogs, significant species of birds (including Barred and Snowy Owls) and amphibians.

The white tail deer that use this area as a “Wintering Area” as well as a “Deer Movement Corridor,” I, and many of my neighbors will validate the presence of deer in the area as described in table 4.4 of Azimuth Environmental Consulting report, which they have deemed “does not meet key habitat criteria for presence of deer wintering habitat.” The deer return annually and are a fundamental presence in a relatively undisturbed parcel of land amongst an urban setting.

This property is connected to Sunnidale park and other green areas that it joins throughout the City. The deer use this corridor as both a wintering yard and in the spring/summer to raise their young. This development will have a significant impact on the wildlife in this area.

The Ontario Ministry of Natural Resources and Forestry developed a “Significant Wildlife Habitat Mitigation Support Tool” (Ontario Ministry of Natural Resources and Forestry, 2014) for sites that have been designated a “Natural Heritage Feature.” On page 8, it describes how deer wintering areas are important in areas where there are few winter concentration areas. It also describes how deer have a “strong tradition to a given wintering habitat” and will return year after year. If displaced from an area, they are forced to use different poorer quality areas, which can affect their mortality rates.

The Ontario Ministry of Natural Resources also explains that “deer show a strong traditional use of winter concentration areas and are reluctant to change their migration habits (Voigt, Broadfoot, & Baker, 1997). Winter range conditions are an important limiting factor to deer populations in Ontario and the further loss of suitable conditions within yards should be avoided. Deer show strong traditional use of winter concentration areas and are virtually impossible to

change in their migration habits (p. 17).” Part of the proposed development will directly affect this deer corridor and wintering yard.

Natural Heritage Features and Functions

Azimuth Environmental Consulting Inc., states that they “assumed that the designation of these NHR areas is primarily attributed to the woodland feature associated with the study area, which the City considers to be Significant Woodland,” I would like to know how the planning can continue based on “assumptions.”

The Ontario Ministry of Natural Resources defines the concept of a Natural Heritage System as “A natural heritage system is an ecologically based delineation of nature and natural function – a system of connected or to be connected green and natural areas that provide ecological functions over a longer period of time and enable movement of species. Natural heritage systems encompass or incorporate natural features, functions and linkages (also referred to as “corridors”) as component parts within them and across the landscape. They also enable the linking of different landscapes (Ontario Ministry of Natural Resources, 2010).” As I’ve described, there is an abundance of species that live here.

I suggest that the parties involved in rezoning and planning for building upon a significantly designated area, have not thoroughly researched the implications of destroying environmentally protected land, of destroying a Natural Heritage System. In fact, the Ministry of Natural Resources states, “The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features” (Ontario Ministry of Natural Resources, 2010).

Alternative Options

I would like to request that a new EIS be conducted in this area over a longer period of time (more than one hour over two days) to identify the SAR and the impact on other wildlife. I

would like solutions to be considered for the impact on the deer wintering area (reduce the building footprint perhaps).

I understand that Barrie continues to grow and finding new places in which to grow is becoming more difficult. However, there needs to be a balance between building and preservation of the ecology and wildlife. Time and again I have seen the City of Barrie rezone EP land to residential, impacting not only the wildlife that live in this area, but also the quality of life of the people that live here as well as their property values. I chose this area because of the EP land. I chose this area because of the abundance of wildlife. To be able to show my daughter, who has grown up in nature – exactly what it is to grow up in nature surrounded by an urban environment, similar to New York’s Central Park.

This area has many hidden wonders, unseen to a passerby. It’s part of the Nine Mile Portage – which is designated by the plaque on Shirley Avenue. It contains several Geo Caches. There is an old bomb shelter known only to locals. And there is an ever changing natural environment that needs someone to fight for its preservation.

In closing, I’m asking the City of Barrie, Planning department to:

1. Request a new EIS and identify SAR and other wildlife (Azimuth Environmental Consulting Inc., also stated that “their data is considered “outdated” and “insufficient to draw conclusions on the presence/absence of SAR.” (p. 13)
2. Work with the MNR to designate this area as a Significant Wildlife Habitat.
3. Determine how to preserve deer wintering and corridor useage.
4. Reduce the planned building footprint.
5. Evaluate the impact on the significant wetlands.

Sincerely,

Frances McGill




References

- Azimuth Environmental Consulting Inc. (2018). *Environmental Impact Study 70 & 76 Edgehill Dr. City of Barrie*. Barrie, Ontario: Azimuth Environmental Consulting Inc.
- Ontario Ministry of Natural Resources. (2010). *Natural Heritage Reference Manual for Natural Heritage Policies*. Toronto: Queen's Printer for Ontario.
- Ontario Ministry of Natural Resources and Forestry. (2014). *Significant Wildlife Habitat Mitigation Support Tool*. Retrieved from <https://dr6j45jk9xcmk.cloudfront.net/documents/4773/mnr-swhmist-accessible-2015-03-10.pdf>
- Voigt, D., Broadfoot, J., & Baker, J. (1997). *Forest Management Guidelines for the Provision of White-tailed Deer Habitat*. Ontario Ministry of Natural Resources.