

**PEEL-CALEDON
SIGNIFICANT WOODLANDS AND
SIGNIFICANT WILDLIFE HABITAT STUDY
Consultation Summary**

October 2008

Cover Page Photo Credits:

- (1) Monarch butterfly (Margot Ursic)*
- (2) Buttonbush in a bog (Karl Konze)*
- (3) Red fox - wildlife habitat / corridor (Karl Konze)*
- (4) Bird's nest (Karl Konze)*
- (5) Green frog at Credit Springs (Karl Konze)*
- (5) Background photo of wetland and woodland on the Niagara Escarpment in Caledon (Marsha Paley).*

As part of the Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study, the project team consulted with members of Caledon Council, stakeholders and members of the public. This volume includes summaries of comments received¹ at the following events:

1. Stakeholder Workshop #1 (April 7th, 2008)
2. Caledon Council Workshop #1 (April 15th, 2008)
3. Caledon Council Workshop #2 (May 13th, 2008)
4. Summary of Stakeholder Comments Received on the Preliminary Criteria and Thresholds for Significant Woodlands and Significant Wildlife Habitat
5. Stakeholder Workshop #2 (June 17th, 2008)
6. Summary of Comments Received from the Public Open Houses:
 - a. June 25th, 2008 (Town of Caledon)
 - b. June 26th, 2008 (City of Brampton)
 - c. June 27th, 2008 (City of Mississauga)
7. Summary of Stakeholder Comments Received on the “Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study Draft Report”, dated July 10, 2008.

Comments on the “Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study Draft Report for Public Comments”, dated October 2008, will be received until December 12, 2008. Comments received on the draft report will be added to this consultation summary report and an updated summary report will be released early 2009.

¹ **Notice With Respect To the Collection of Personal Information**

Personal Information collected as a result of this stakeholder consultation was collected pursuant to the *Planning Act*, R.S.O. 1990, c.P.13 and will be retained, used, disclosed and disposed of in accordance with the *Municipal Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c.M.56. All names, addresses, opinions and comments collected will be used to assist in making a decision on this planning matter. Questions regarding this collection may be directed to the Director, Planning Policy and Research Division, Environmental, Transportation and Planning Services, 10 Peel Centre Drive, 6th Floor, Brampton, Ontario, L6T 4B9.

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WORKSHOPS

1.0 Workshops

1.1 Stakeholder Workshop #1 (April 7th, 2008)

General Questions and Discussion

Question: Is the study looking at both the Region and Town scales?

Answer: Yes. Criteria and thresholds will be recommended for both the Regional and Town scales.

Comment: How the criteria are mapped in the Official Plans (OPs) still needs to be discussed. A scale of 1:50,000 shows confidence in the data. May need to look at what scale is appropriate per criteria. The language of the policy should clarify that field checks are needed to verify the data.

Question: Can the Ministry of Natural Resources (MNR) Significant Wildlife Habitat Decision Support System be made available to members of the general public?

Answer: Yes. It is available on-line along with the MNR Significant Wildlife Habitat Technical Guidelines. The link to the website will be emailed to the stakeholder group.

Question: How is the Provincial *Endangered Species Act* being considered as part of this study?

Answer: Municipal significant wildlife habitat policies must conform to the Provincial *Endangered Species Act* and the Federal *Species at Risk Act*. Municipal policies also protect habitat not covered by other legislation. Locations of endangered species habitat are confidential, even to landowners. Therefore, it is difficult to map such habitat locations. Currently, the Province has data that shows a 1 km square within which the endangered species habitat is located. Field checking through an Environmental Impact Study (EIS) is needed to determine the location and condition of endangered species habitat.

Comment: Seems like the process is backwards. The planning process needs to first state the policy purpose and goal. Then the criteria should be developed to address the policy purpose and goal.

Response: the Province through the Provincial Policy Statement (PPS) has established the policy purpose and goal for significant woodlands and significant wildlife habitat. The Peel-Caledon study will provide an upfront and transparent process to identifying significant woodlands and significant wildlife habitat prior to the development of official plan policy.

Comment: Landowners have a lack of confidence in relevant data for identifying significant wildlife habitat.

Response: Through the Peel-Caledon study, the consultant team will review existing data for Peel and identify which data sets are most appropriate for supporting the identification and

evaluation of significant wildlife habitat. The final report will document all data sources used within the study.

Comment: Fish habitat should be considered, as they are relevant to wetland protection.

Comment: Friends of Claireville – the definition of woodlots provided through the Provincial Policy Statement (2005) (PPS) and the MNR Natural Heritage Reference Manual is a much more holistic definition than the *Forestry Act*.

Question: Alton-Grange Association – was the municipal consultation done only with Ontario municipalities?

Answer: Yes, because the study must respond to the direction of the PPS.

Comment: The protection of wildlife habitat and wildlife population management impacts farming. Some wildlife carries diseases that create human health issues. Huge costs are associated with wildlife population management and the Province needs to take responsibility if they require landowners to undertake population management measures.

Question: Alton-Grange Association – will the criteria factor in a watershed perspective?

Answer: The study is a features-based approach. However, the Region and the Town both have identified natural heritage systems that include all watersheds in Peel, but which are limited to the extent of the municipal boundaries of Peel Region. Outside of this study, Credit Valley Conservation is conducting a Natural Areas Inventory (NAI) for Peel that will be collecting wildlife habitat data for the entire Credit River watershed and all of Peel Region. This information will further support the criteria and thresholds to identify significant wildlife habitat within Peel.

Comment: The Paris Moraine serves an important ecological function in Peel and should be considered as part of the study.

Question: Peel Federation of Agriculture – At one point all of Peel was a Significant Wildlife Habitat, and then land was cleared to allow for agriculture. Will agriculture be allowed within Significant Wildlife Habitat?

Answer: The PPS and existing Regional and Town OP policies allow for existing agricultural practices to continue within significant woodlands and significant wildlife habitat. Regional and Town staff will seek clarification from the Province on the levels of protection that are required and what types of agricultural uses are permitted (*e.g.*, historical and on-going uses).

Comment: “Licensed” pits and quarries should be exempt, instead of “active” sites.

Round-table Discussions of Preliminary Criteria and Thresholds for Significant Woodlands (SW)

General Comments

- there is a need to ensure the SW policies do not adversely affect the farming community; if a farmer wants to convert a SW to agricultural uses but cannot then compensation should be available
- there should be acknowledgement of woodlands established for fibre production; *i.e.*, the policies should not preclude harvesting a plantation
- do SW criteria drive landowners to “brush-hog” their property on a regular basis to avoid trees developing and thus an area meeting the criteria of SW
- there was a desire to consider “patch shape” as a criteria
- there was a desire to consider “carbon fixation” as a criteria
- we should distinguish between “natural” features and “man-made” features – only the former should be identified

Woodland Definition

- there is merit in using the broad definition provided in the PPS as this allows evaluation of woodlands and intervening areas such as old fields that may provide an ecological linkage function
- there was recognition for a need to develop local (municipal) scale definition for good environmental planning and protection policies
- the question was raised as to... What woodlands definition is to be used for the Greenbelt?
- ORMCP definition is broad, includes young successional communities for which digital data are likely not available making it difficult to map all woodlands within the study area
- no strong objection to the consultant team’s suggestion to use the ORMCP definition

Size

- within urban areas where woodland cover is < 5% social values predominate in the evaluation of significance and woodlands 0.5 ha are significant
- need to remember that the object is to identify significant woodlands, not all woodlands. There is a risk that identifying all woodlands diminishes the meaning of “significant”

Interior Woodland

- concept accepted as valid, question remains of how much “interior” needed to be considered significant
- using the *Forestry Act* definition for woodland may result in early successional woodland being identified as “interior woodland” based on a size criteria alone... therefore, to avoid this, there may be a desire to consider both size and ELC vegetation type/series for this criterion
- there was also acknowledgement of the dynamic nature of communities and the potential of “future interior woodland”

Age and Old Growth

- what methodology does FRI use to determine stand age? Is this method applicable?
- it was noted that FRI was inaccurate and old

- areas that have never been farmed have “ancient” soil profiles that are significant
- there is a concept of “original woodlands” referring to areas “less managed”, “less disturbed”, “less grazed” that have higher ecological value

Slope

- considered by some to be a valid criteria based on landscape stability and erodibility (threshold slopes > 10%)

Quality (includes human disturbance)

- quality alone is not a criteria; it makes more sense if it is qualified, for example, “quality of deer habitat”
- one participant thought that quality was key, since it is the high quality woodlands that should be protected - cited examples of low quality woodlands composed of scrubby non-native trees that were still identified as significant owing to size or some other factor, but which should not be identified as such
- there were suggestions that quality is difficult to define
- it was recognized that what might be classified as “low quality” woodland may have important ecological functions such as a linkage function.
- appears not to be recommended by the stakeholders at round table

Linkage

- if considered, linkage must be a viable ecological linkage meeting the needs of resident wildlife
- linkage must link two or more components of an ecological system
- linkage may be between woodlands or other natural communities such as wetlands
- there should be a clear and practical test that demonstrates linkage function is performed

Proximity

- science behind proximity criteria is sound
- thresholds for proximity criteria difficult to ascertain
- may be measured by distance to a (adjacent) (significant) feature or the total amount of woodland (ha) within a defined area (*e.g.*, 1 km radius)

Economic/Social Value

- strong relationship to human health both physical and mental
- related to aesthetic values in an urban setting
- may be related to carbon fixation
- when asked if an economic/social criterion should be used to confer significance, when the candidate woodland would not fulfill any other criterion, the participants generally felt it should

Round-table Discussions of Preliminary Criteria and Thresholds for Significant Wildlife Habitat (SWH)

GENERAL COMMENTS

- NEED TO REFINE SWH CRITERIA & THRESHOLDS:

- The current list and proposed thresholds are too broad and have the potential to encompass too much; they need to be qualified and/or refined to be more easily applied – otherwise you run the risk of creating a huge back lash
 - These criteria should be associated with natural habitats, and placed in the context of a natural heritage system [several people expressed concern that this be done in the context of habitats; more holistically on a landscape scale]
 - One approach may be to keep SWH as associated with natural areas and wildlife habitat on cultural landscapes (*e.g.*, plantations, old fields) should be subject to voluntary stewardship / restoration. Only areas that are associated with remnant / “true” habitats should be subject to mandated protection. If this interferes with uses on managed lands, there will be a lot of resentment in the agricultural community.
 - Should distinguish between habitats that are fixed (*e.g.*, seeps and springs) versus those that change from year to year (*e.g.*, colonial nesting areas) for long-term land-use preservation.
 - Should not apply land use designation where management plan would be more appropriate.
- In the past, natural heritage systems / corridors have become location for major infrastructure (*e.g.*, Don Valley Pkwy, Red Hill Expressway) [implying that setting aside large tracts of land for conservation may be futile and even problematic if it provides future opportunities for major highways?]
 - Need to have regard for agricultural lands, esp. Class 1, from both their importance re. food production and, increasingly, energy production (*e.g.*, biofuels)
 - APPROACH:
 - Will the criteria be ranked or weighted in any way? The fact that they are each meant to stand independently does not come across clearly in the presented materials.
 - Thresholds are a very useful tool and a valuable way to determine significance but tend to be labour-intensive to develop
 - This approach is science driving policy; some agree that this is the right approach; others feel policy should drive the process and then science / data collection should fill in the gaps
 - Rationale for each criteria and justification for each threshold needs to be clearly presented; some rationale in work done by MNR and CWS
 - Need to keep in mind these are screening criteria
 - One approach may be to consider “higher trophic level” species that capture the needs of multiple species [umbrella species or keystone species theory]; this may simplify things
 - DATA GAPS:
 - If adequate data is missing for so many SWH criteria, why bother pursuing this? Proponents will need to provide data at site-specific level at a later date anyway.

- The lack of data is no rationale for not pursuing this; we need to work towards protecting the full diversity of habitats on the landscape because if we wait until “all” the data is in it will likely be too late.
- SWH is based on concept of representation, which required jurisdictional-wide studies, and this is too costly and cumbersome a burden to put on the proponent every time a development or re-zoning application is submitted. Some refined guidance from the municipality can at least scale down the scope of site-specific studies required.
- (Region) Part of the purpose of this study is to identify where the data gaps are and priorities for future studies
- Where there is data missing, the Region should clearly lay out steps for moving forward / what is required

A1. Deer wintering areas

- CON – Deer are a huge problem for farmers (they cause significant crop damage resulting in direct loss of income, plus expenditures related to trying to keep them away from crops) and should not have special protection through SWH criteria. Deer are not “rare” but all too common.
- CON – deer create road safety hazards
- CON - Deer do not have specific/specialized habitat needs, and are quite adaptable (*e.g.*, do not require cedar swamps) and therefore would be able to utilize any habitats set aside as part of a natural heritage system
- CON – Deer need to be managed, so provided with special protection.
- PRO – Deer are part of our landscape and we need to accommodate their habitat needs.
- PRO – if we do not protect them or their habitat now then they may be gone from the landscape in several decades
- There are several known deer “yards” (*i.e.*, observed large aggregations of deer; est. at least 25) on the (a) edge of Norval, (b) Grange property near Alton, (c) Heart Lake area, (d) plus others in Caledon.

A4. Migratory stop-over areas

- Many of the large lakes (*e.g.*, north of Caledon village) are man-made ponds; should these now be subject to SWH restrictions?
- Need a management plan; not prohibitions.
- In this case, Mississauga must protect this habitat for the entire Region; is Caledon expected to protect a greater proportion of its natural heritage because south of Mayfield Rd is so highly developed? Many farmers do not mind fulfilling this role / contributing to this (*i.e.*, NH protection on their lands) as long as they are compensated for it financially.

B1 through B6. Specialized habitats

- These all relate to rare / uncommon forest types / features – this should be a starting point for identifying SWH since these are significant habitats that will provide for a diversity of species

B7. Seeps & springs

- These areas are irreplaceable and should have special protection because of their role in feeding baseflow to the Credit and contributing to overall water quality and quantity

1.2 Caledon Council Workshop #1 (April 15th, 2008)

General Questions and Discussion

Comment: Would the team consider the following question during their presentation: What is the benefit/added value to landowners in Caledon? The Greenbelt already covers about 90% of Caledon. Our cropland is inundated with lots of restrictions already. Cropland should not be impacted. In addition, deer have become a major problem for farmers – deer are carriers of disease and therefore impact human health.

Comment: Support for a resident's suggestion to develop wildlife management plans first to determine whether an area warrants the necessity for wildlife habitat protection. There will be push back from private landowners. Woodlands are already untouchable through woodland management plans.

Response: Concern regarding deer habitat protection was expressed at the stakeholder consultation on April 7, 2008. The Provincial criteria for identifying deer habitat are more so for areas with less agriculture and more snow coverage. Therefore, the criteria may not apply to Peel. The consultant team is working with Ministry of Natural Resources (MNR) staff to identify alternative measures for dealing with deer habitat in Peel. For Peel, deer habitat is more generally associated with woodlands. Protection of significant wildlife habitat should not interfere with existing agricultural practices. Significant wildlife habitat policies will apply when a development application is submitted.

Comment from Project Team: Through the policy component of the PPC and PROPR, there may be opportunities to consider the ecological goods and services associated with protecting significant woodlands and significant wildlife habitat and what that means to private landowners.

Comment: You are asking for a revolt from landowners – they have an investment in their land. Permanent pasture land not only feeds cattle but wildlife. Will those pastures be protected by policy?

Comment: If the Province is having difficulty producing guidelines and other municipalities find it too difficult to identify significant wildlife habitat, why are we being a leader? It is too expensive to do ground proofing, but we have to. How can we justify to landowners that we are spending rate payers' money to restrict their rights? We don't need areas to be protected through legislation.

Comment: Council would like a copy of stakeholder comments.

Comment: The policy component should consider compensation to landowners from the Province.

Comment: Discussion of issues needs to be out in front in order to get buy-in from landowners.

Comment from Project Team: Currently, determining a significant wildlife habitat is dealt with through an Environmental Impact Study (EIS) as part of a development application. This study

will scope the PPS interpretation of “significance” and make a “made in Caledon and Peel” interpretation. The recommended criteria and thresholds for significant wildlife habitat will refine the requirements of EIS studies.

Comment: We need strong expert opinion. When we had to meet Provincial conformity for the Oak Ridges Moraine Conservation Plan (ORMCP), the Provincial expertise was not good enough. We have to make sure that the data is correct. For example, with the Town’s Environmental Zoning By-law, anyone who felt the designation was not correct on their property could meet with staff for a site walk. Caledon citizens have gone through a lot and will be upset with one more piece of legislation being added on top. If licensed pits and quarries are being exempt from significant wildlife habitat, so should agriculture because those lands feed people. The over population of deer is a huge problem for all the GTA. There is a meeting with Caledon Council and the Minister of Natural Resources to discuss the over population of deer in Caledon.

Comment: Between 1890 to 1910, the forest cover was down to 7%, and now it is up to 20%. Agricultural practices ceased, so forest populations came back. Policies need to recognize that the Town is a “re-work” by people. Coniferous planted forests replace deciduous forests. The Generic Regulation took 7.5 months to get approval. Need to proceed with encouraging the enhancement of the environment with landowners rather than restrict, or we will make it difficult for people living here or who want to buy a lot of record.

Comment: Caledon is the greenest town in Ontario. The people are responsible for that through good forestry and agricultural practices. It costs a lot to live in Caledon for those who are not farmers or licensed pit/quarry operators. Landowners are investing their income to plant trees on their properties.

Comment: If a landowner finds out their property has a rare species or Significant Wildlife Habitat and policies restrict their property rights, they will be encouraged to destroy the habitat and/or remove the species. Similar comments were made at the stakeholder consultation. Policies need to ensure that they are not creating disincentives for landowners to protect greenspace

1.3 Caledon Council Workshop #2 (May 13th, 2008)

General Questions and Discussion

Question: We seem to be rushing this through fairly quickly – why?

Answer: Staff is working within a very tight timeframe. The Official Plan (OP) update must be completed by June 2009. We need the technical study first in order for staff to get to the policy development.

Question: Has the agricultural community been consulted?

Answer: Yes, they are invited to the stakeholder consultations, and there was a large turn out from the agricultural community at the April 7, 2008, stakeholder consultation.

Comment: You will get push back from rural landowners if bush lots can potentially become significant woodlands after natural regeneration. Also, air photo interpretation is not accurate.

Response: Policies would allow for existing agricultural practices to continue. We are not starting from scratch – existing Environmental Policy Area (EPA) policies in the OP permit existing agricultural practices.

Comment: It is important to remind everyone that we are not reinventing the wheel. We have gone down the road and landowners do not need to advocate for their position again – that should be clear and upfront in presentations to the public.

Comment: Landowners feel that they have their own rights and people should not interfere.

Response: The Provincial Policy Statement (2005) (PPS) has clear policies that permit agricultural practices to continue.

Question: What is the PPS intent to put these policies in place?

Answer: To protect significant natural resources

Comment: Developing criteria is fine. But the unending march on landowners is not. There should not be policy for geography, until a development application comes in – then the criteria are applied to examine significance. Rural landowners keep strategic reserves of timber on their properties to fuel their farmstead – if those woodlands are identified as significant, landowners may harvest them to keep lands in agriculture.

Response: We are not doing anything new – rather, we are seeking out specific detailed information for the Town and Region to ensure policies are being applied on a fair and consistent basis.

Comment: Comment on the statistics – the table should show the total Greenbelt Plan area and break it down for the area within the Niagara Escarpment Plan area, area within Oak Ridges Moraine Conservation Plan area, and then the remaining lands within the Greenbelt Plan area.

Question: Regarding proximity to surface water criterion: If a water feature, such as a river, is in close proximity to just one small area of the woodlot, will the entire woodlot be deemed as significant?

Answer: Yes.

Question: Can Council get copies of the statistics tables included within the presentation?

Answer: Yes, but keep in mind that the thresholds are not finalized at this point.

Question: Will there be flexibility at the policy stage to choose which criteria should be included or excluded?

Answer: Yes. Also, the thresholds at the Regional scale will be different than the local scale (e.g., 20 ha size at Regional level and 4 ha size at local level).

Comment from Project Team: Challenge with developing criteria and thresholds for significant wildlife habitat is that there is no precedence like with significant woodlands. However, the consultant team is working closely with Ministry of Natural Resources (MNR) staff and so far MNR staff is supportive of the study approach.

Comment from Project Team: It is not possible to map significant wildlife habitat – Province confirmed that municipalities are not required to map significant wildlife habitat. Rather significance is to be determined at the development level on a case-by-case basis. The study will help develop a set of guidelines to be used at the Regional and local scales.

Question: Would the identification of significant wildlife habitat be captured during an EIS at the secondary plan level?

Answer: Yes. Through this study, we are scoping the criteria and thresholds that will be applied at the development stage. It is not duplication, rather a refinement of the study requirements.

Comment: Some landowners will not be subject to develop and therefore should not have their rights taken away from them. For example, if they let scrub land grow, and it becomes significant, they then lose development potential on their properties (not large scale residential development but rather building accessory structures). Landowners are better off cutting down their bush lot than letting it regenerate to become a woodlot. This is not a good thing – the box we have put people in with our own rules. There needs to be some flexibility for landowners to let land naturalize without constricting people from taking progressive steps. Most people are willing to let scrub land grow up, but they do not want to be limited as a result.

Comment from Project Team: This is a technical piece. When we enter the policy piece, we need to be clear that we have grappled with these issues, have put our minds to these issues and have come up with reasonable solutions. The direction for the PPC is that we are only making policy amendments where conformity is absolutely needed.

Question: Is the Ontario Ministry of Agriculture and Food (OMAF) involved?

Answer: Yes. Through the one-window commenting process, OMAF will be given the opportunity to comment.

1.4 Stakeholder Workshop #2 (June 17, 2008)

General Questions and Discussion

Comment: Policies for significant woodlands and significant wildlife habitat need to consider the impacts on landowners and agriculture. The Environmental Farm Plan (EFP) is a private document developed by landowners but has been reviewed by the Province. There is an accountability measure that has been put into place to ensure that the Plan is carried out. The plan covers such things as seeps and springs, farm properties, wells, woodlots and what things are needed to adapt to wildlife. This is to promote best practices, not just for all farms even large rural properties. Is there a similar stewardship program for the Oak Ridges Moraine?

Response: The Oak Ridges Moraine Foundation's "Caring for the Moraine" Project offers stewardship programs for landowners.

Question: How does this study fit with the Region's growth management study for conformity with the Provincial growth plan? Has a different approach been taken into consideration?

Answer: This study is a component of the Natural Heritage Policy Review project under the Peel Region Official Plan Review (PROPR). The Region identifies a natural heritage system within the Region Official Plan, called the Greenlands System. This study provides technical guidance in identifying significant woodlands and significant wildlife habitat as features of the overall natural heritage system. This technical study will help the Region answer the question on how we are being consistent with complying with the Provincial growth plan legislation. There are uses of this information for growth plan calculations such as density calculations.

Question: Will the secondary plan studies like Mayfield West capture this information too?

Answer: Mayfield West and south Bolton are undergoing their own environmental reviews. When the result of this study are available, staff will work together to consider how it will be used in the secondary plan studies. This study will be completed before the secondary plan studies are done. Through this study, staff is certainly considering landowners comments and have regard for previous secondary plans and are consulting with area municipal staff.

Question: Would there be an increase in conserving natural areas as they become available?

Answer: Natural heritage protection can be looked at in two ways. One way is a feature-based approach and the other is a systems approach to encourage restoration of the natural heritage system and that is important. The Region is going to include some information on natural heritage system planning within its Natural Heritage Policy Review Discussion Paper that is to be released in the fall. The Region's Natural Heritage Policy Review workplan talks about a Phase 2 to look at a natural heritage systems strategy that will consider the identification of restoration lands. Currently, the Region Official Plan already has restoration policies in place. Staff may consider reviewing the restoration policies through the natural heritage policy review process.

Comment: Protecting various areas will need to involve public education.

Response: The Region's Greenlands Securement Project currently has a landowner outreach and education program that could be built upon in the future.

Comment: I have trouble with the word "significant". It is an overused non-descriptive, not scientifically defensible word. It is also redundant. Would it be helpful to use the word "ecologically" significant?

Response: The difficulty is that the Province has directed municipalities to use the definition of "significance" as provided in Provincial Policy Statement (PPS). Through this study, we are trying to define specifically what this means for the Region and the Town.

Comment: Protecting more and more areas becomes a bigger issue. If one species is protected, it might start preying on others and that starts to impact habitat. For example, a beaver blocks a stream and does not allow aquatic life to move upstream. Waterfowl can become a huge problem by contaminating water. If we are going to protect all these woodlands and wetlands then we better not proceed before we have a management plan on wildlife such as a provincial management program. It is MNR's responsibility to manage wildlife. Raccoons and deer love disturbed landscapes. What this is doing is it is trying to protect undisturbed landscapes. Having cities will produce more raccoon issues.

Response: These comments will be communicated to MNR staff.

Question: In terms of the proximity criterion for significant woodlands, will "significant features" include significant wildlife habitat?

Answer: Significant wildlife habitat was not included in the definition. A definition is provided in the technical report, and includes Provincially Significant Areas of Natural and Scientific Interest (ANSIs), Environmentally Sensitive Areas (ESAs), Provincially Significant Wetlands (PSWs), significant valleylands, and also other significant woodlands but only if they are defined by the size criterion. Right now Peel is doing a separate study on the identification of significant valley and stream corridors.

Question: There is a huge resource of information provided by birdwatcher groups in terms of the birds they have observed (i.e. certain varieties and species). Have you looked at that data?

Answer: Short answer is no partly because while there is this extensive network where birdwatchers are communicating with one another, mostly it is their observations. While you would say it is directly relevant, data gathering is not necessarily scientific. We therefore treat them as incidental observations where you know specifically what sort of habitats are there. However, there is a database on breeding birds put together by volunteers and that data is being monitored and has been verified. Also, Credit Valley Conservation (CVC) is currently undertaking a Natural Areas Inventory (NAI) for all of Peel and will be conducting a breeding bird survey this year.

Roundtable Discussions

Significant Woodlands

Discussion on Criteria Not Recommended for Identifying Significant Woodlands

Question: The shape of a forest is important for interior habitat, not just size (i.e. rounder patches provide better interior habitat than linear patches). Eliminating interior forest makes sense since it is covered by the size criterion, but there should be mention of shape for the size criterion as well. Does a size threshold at 16 ha (to ensure 4 ha of interior habitat) dismiss smaller woodland patches that may have some interior habitat.

Answer: The project team will examine whether any additional interior habitat is captured using a threshold less than 16 ha.

Comment: Ultimately various features are going to include the designation of “significance”. The objective is to preserve ecological function and that is not a criterion. Therefore it is important to make sure that the concept of protecting ecological function is carried forward into policy. Whatever language or recommendations go forward need to speak to a bigger picture, including groundwater conservation.

Response: Ecological function was rejected as a criterion, because it was difficult to deal separated from other criteria. It is dealt with through the other criteria that aim to identify and evaluate various ecological functions of woodlands.

Comment: The quality of woodlands is important to consider. There is no vision in the PPS for quality of woodlands, it just administrative. We need a vision of what it is that we are to achieve.

Comment: What we are doing right now is fairly high level. When we get to the policy stage, we need to have some kind of a vision articulated of why the whole thing has been done and what is to be achieved.

Question: Once policy is decided we can go back to amend the criteria?

Answer: Through the Peel Region Official Plan Review (PROPR) and the Town’s Provincial Conformity Process (PPC), staff will make recommendations on the final criteria. Once the policy is approved, an amendment to the Official Plan will be required if the criteria are to be changed. For significant wildlife habitat, there are a criteria that cannot be mapped due to data gaps, so there is a good likelihood that staff will be considering the option of not mapping or even not including criteria specifically in the ROP for significant wildlife habitat. That is to be determined during the policy development phase to follow this study.

Comment: At the end of the day when you hit zoning you are still taking away the land use rights that people are enjoying now. So you need to think it right through to the bottom.

Response: If implemented in zoning, permitted land uses will be affected.

Question: What happens if woodlands are on class 1 to 2 agricultural lands? Does agricultural land takes precedence as according to Province?

Answer: Normal farm practices will continue and existing agriculture can continue in Environmental Policy Areas as identified in the Town's Official Plan. Within the Natural Heritage Policy Review Discussion Paper, staff is considering stewardship opportunities and incentive programs for landowners affected by natural heritage policies.

Question: Why not include slope in criteria?

Answer: The Technical Advisory Team discussed the role of woodlands for erosion control. The conclusion was that although any vegetation on a slope is important for erosion control, there are many factors for determining the extent to which woodlands prevent erosion. The Technical Advisory Team came to conclusion that there are too many variables for determining a threshold for the slope criterion and as such it would be difficult to defend.

Discussion on Criteria Recommended for Identifying Significant Woodlands

Question: Size is one of the most important criteria. If nothing else it is most easily met. The most recent scientific literature states that forest coverage is what is driving function or the significance of woodlands in the landscape. Therefore, I see your rationale for the 16 hectares threshold. Have you considered that if the threshold is lower it would include some of the smaller woodlands and capture their functions?

Answer: The Technical Advisory Team debated the size threshold at fair length and 16 ha was the consensus. It is a relatively high threshold and there are some caveats in the study report that smaller woodlands do have some value and in urban areas there may be recommendations for smaller thresholds to accommodate social values.

Question: Perhaps the proximity criterion will capture the function of smaller woodlands?

Answer: The proximity criterion (i.e. woodlands within 30 m of water course) ends up identifying most woodlands as significant.

Question: Regarding woodland quality, when there is a proposed change to landscape or a pool or a clearing that requires the clearing of a woodlot that is when you look at the merits of the woodlot. Are there ways for addressing the quality of the woodlot in the greater scheme of things? A quality measurement should be required.

Answer: There are some really degraded habitats and this is something staff should consider. The quality criterion was not accepted, because it is difficult to set thresholds for woodland quality.

Question: Is a woodland "significant" if it only meets one of these criteria?

Answer: Yes.

Question: Regarding the economics criterion, draft recommendations state that woodlands have a recognized economic value. How is this economic value determined or “recognized” (e.g. through a particular program)?

Answer: The economic criterion was considered because the Provincial Policy Statement (PPS) uses economics as a factor of “significance” for woodlands. When considering the economic value of a woodland, it would be a dollar value or whether other products that could derive out of the woodlands. Determining thresholds for measuring economic significance is difficult, because at present there are no databases that the consultant team know of that are suitable for measuring the economic value of woodlands in Peel.

Question: Regarding the age criteria, does it apply to woodlands older than 90 years or trees within woodlots?

Answer: The criterion could apply to a whole woodlot or to an area within a woodlot that has old growth trees.

Question: Would plantations be considered significant?

Answer: The Oak Ridges Moraine Technical Guidelines provides guidance when determining whether a plantation should be excluded. The project team recommends that the Region and Town consider those guidelines when developing policy for significant woodlands.

Discussion on Significant Wildlife Habitat Criteria

Question: I like your thresholds in general. How have you consulted with the Ministry of Natural Resources (MNR)?

Answer: MNR staff sits on the Technical Advisory Team (TAT) for the project. Also the consultants have had on-going discussions with MNR staff from the Natural Heritage Information Centre (NHIC) and with MNR staff who has been involved in helping develop the technical guidelines for the ecoregion in which Peel is located. MNR staff on the TAT have reviewed draft report and provided comments.

Question: What scale is being used to measure the recommended thresholds? Is it a property scale?

Answer: The thresholds are not clearly defined as of yet so it is difficult to answer that. It is recognized that a given wildlife habitat may not be confined to one property, and may even need to be examined at a larger regional scale. This study will help identify data gaps and studies that are needed to examine wildlife habitat at a larger scale. For example, there may be an opportunity to advocate to the Province for a regional scale study on shoreline landbird migration habitat along Lake Ontario.

Question: What is the approach for applying these criteria and thresholds?

Answer: GIS data is not available for most of the significant wildlife habitat criteria and thresholds. Therefore, it will be difficult to map significant wildlife habitat within the Region and Town's Official Plans. Staff are considering a recommendation to apply the criteria and thresholds at the site level when a natural heritage study is required as part of a development application. This study is great value to landowners and developers, because it provides information on significant wildlife habitat in Peel and provides guidelines for undertaking an assessment at the site level. This study is creating a base of information that can be built upon.

Question: How will you determine animal movement corridors? Will you be recommending using tags or tracking devices?

Answer: The type of vegetation and proximity to other natural heritage features typically tells us what wildlife is using those areas as corridors. If ecologists have the opportunity, they often do tracking surveys for particular species. Such surveys are outside the scope of work for this study.

Question: How will the identification of significant wildlife habitat impact property values and agriculture?

Answer: Significant wildlife habitat policies and studies are triggered when a development application comes forward. Normal farm practices can continue.

Question: Regarding seeps and springs. Is the whole catchment area protected? How would you determine the catchment area?

Answer: The whole catchment area would not necessarily need to be protected as significant wildlife habitat. A site-specific study would need to be completed to determine whether the seeps and springs are significant wildlife habitat and their relation to the larger catchment area.

Comment: I am not so much concerned with seeps and springs but more of the catchment areas. I do not know of many people who would build on seeps and springs deliberately but catchment areas are different. Having to examine a catchment area as a significant wildlife habitat involves studying more than one property and can cost a lot of money.

Comment: The report should expand a little on wildlife habitat of seeps and springs. The objective is not just protecting seeps and springs, but that there is a wildlife habitat protection objective.

Question: What is the adaptability of these bird species and how will they adapt to other areas?

Answer: There are species that are highly adaptable and some species that are not. Significant wildlife habitat protection is concerned with species that are not adaptable and are at risk.

Question: Is there a review or update cycle for examining areas identified as significant wildlife habitat?

Answer: The issue is when there has been some rare sighting from long ago but you do not know if it is going to be there anymore. Some ecologists use 20 years as the cut off. However, it is also important to look at what is happening within the larger natural heritage system. For example, if there are wetlands that have disappeared it is important to know why and what impacts this has on wildlife habitat.

PRELIMINARY CRITERIA AND THRESHOLDS

2.0 Summary of Comments Received on the Preliminary Criteria and Thresholds for Significant Woodlands and Significant Wildlife Habitat

Comment Number	Comment Source	Comments
Agricultural Groups (A)		
A-1	Caledon Resident	<p><u>Significant Woodlands Criteria</u> Size: Region – urban >0.5 ha; rural .4.0 ha. Caledon – all lands .4.0 ha. Presence of Woodland Interior: Table 1 thresholds OK. Age and Old Growth: Table 1 thresholds OK. Slope: Table 1 thresholds OK. Quality (includes human disturbance): Table 1 thresholds OK. Linkage: Linkage of woodlands should not be encouraged on class 1, 2 and 3 land. On other land, use 20 m. Proximity: Proximity should not be an issue on class 1, 2 and 3 lands. On other land, use 30 m. Representation (forest community type): Rare woodlands should not be treated differently unless there is financial compensation to the landowner. Representation (age): Age should not be a measure of woodlot value. Ecological Functions: Table 1 thresholds OK. Surface Water Quality and Quantity: Table 1 thresholds OK. Groundwater Quality and Quantity: Table 1 thresholds OK. Diversity of Communities and Species: Table 1 thresholds OK. Existing Designations: Table 1 thresholds OK. Significant Species and Communities: If this is to be a criterion then there must be compensation to disadvantaged landowners. Economic/Social Value: Only if landowners are compensated for lost income or lost property value. Floristic Quality Index: Only if landowners are compensated for lost income or lost property value. Significant Landforms: Table 1 thresholds OK.</p> <p><u>Significant Wildlife Habitat Criteria</u> Seasonal Concentration Areas: <u>Deer wintering area:</u> Deer should not be protected. They are already a road hazard and are damaging private property. <u>Colonial bird nesting sites (e.g., heronry, gull colony):</u> Except cropland fields for class 1, 2 and 3 land – unless there is fair compensation. <u>Waterfowl nesting habitat:</u> Except cropland fields for class 1, 2 and 3 land – unless there is fair compensation. <u>Raptor wintering areas (i.e., used for feeding and/or roosting):</u> Except cropland fields for class 1, 2 and 3 land –</p>

Comment Number	Comment Source	Comments
		<p>unless there is fair compensation.</p> <p><u>Migratory stopover (or staging) areas:</u> Landbirds / Bats / Butterflies / Waterfowl (Terrestrial) / Waterfowl (Aquatic) / Shorebirds:</p> <p>Except cropland fields for class 1, 2 and 3 land – unless there is fair compensation.</p> <p><u>Snake hibernacula:</u> Except cropland fields for class 1, 2 and 3 land – unless there is fair compensation.</p> <p><u>Bat maternal roosts and hibernacula:</u> Except cropland fields for class 1, 2 and 3 land – unless there is fair compensation.</p> <p><u>Bullfrog concentration areas:</u> Except cropland fields for class 1, 2 and 3 land – unless there is fair compensation.</p> <p>Rare Vegetation Communities or Specialized Habitat for Wildlife:</p> <p><u>Rare vegetation communities:</u> Not to apply on class 1, 2, and 3 lands unless there is full compensation to property owners.</p> <p><u>Forests providing a high diversity of habitats:</u> See consultant threshold.</p> <p><u>Old-growth or mature forest stands:</u> See consultant threshold.</p> <p><u>Foraging areas with abundant mast (i.e., fruit-bearing trees or shrubs:</u> See consultant threshold.</p> <p><u>Cliffs and caves:</u> Active quarries should be excluded (not licensed).</p> <p><u>Seeps and springs:</u> Include all seeps and springs that are not on class 1, 2 and 3 land.</p> <p><u>Amphibian breeding habitat:</u> i. Forested sites (e.g., vernal pools) / ii. Non-forested sites (e.g., marshes):</p> <p>Not on class 1, 2, and 3 land unless landowner compensation is in place.</p> <p><u>Turtle nesting habitat and turtle overwintering areas:</u> Not to impact class 1, 2, and 3 land unless landowner compensation is in place.</p> <p><u>Habitat for area-sensitive species:</u> i. Interior Forest Breeding Bird Species / ii. Open Country Breeding Bird Species: (Note: “Habitat for area-sensitive open country breeding bird species” has since been changed to “Habitat for open country and early successional breeding bird species”, slightly changing the emphasis of the criterion.)</p> <p>Not to impact class 1, 2, and 3 land unless landowner compensation is in place.</p> <p><u>Habitat for wetland breeding bird species:</u> Not to impact class 1, 2, and 3 land unless landowner compensation is in place.</p>

Comment Number	Comment Source	Comments
		<p><u>Raptor nesting habitat: i. Raptors assoc. w/ wetlands, ponds, and rivers / ii. Raptors assoc. w/ woodland habitats:</u> Not to impact class 1, 2, and 3 land unless landowner compensation is in place.</p> <p><u>Mink, River Otter, Marten, and Fisher denning sites:</u> Not to impact class 1, 2, and 3 land unless landowner compensation is in place.</p> <p>Habitat for Species of Conservation Concern Criteria:</p> <ol style="list-style-type: none"> 1. <u>Species identified as nationally Endangered or Threatened by COSEWIC which are not protected in regulation under Ontario’s Endangered Species Act:</u> Not to impact class 1, 2, and 3 land unless landowner compensation is in place. 2. <u>Species identified as Special Concern based on Species at Risk in Ontario List that is periodically updated by OMNR:</u> Not to impact class 1, 2, and 3 land unless landowner compensation is in place. 3. <u>Species that are listed as rare (S1–S3) or historical in Ontario based on records kept by the Natural Heritage Information Centre in Peterborough:</u> Not to impact class 1, 2, and 3 land unless landowner compensation is in place. 4. <u>Species that have a high percentage of their global population in Ontario and are rare or uncommon in the Regional Municipality of Peel / Town of Caledon:</u> Not to impact class 1, 2, and 3 land unless landowner compensation is in place. 5. <u>Species that are rare within the Regional Municipality of Peel/Town of Caledon, even though they may not be Provincially rare:</u> Not to impact class 1, 2, and 3 land unless landowner compensation is in place. 6. <u>Species that are subjects of recovery programs (e.g., Black Duck):</u> Not to impact class 1, 2, and 3 land unless landowner compensation is in place. 7. <u>Species considered important to the Regional Municipality of Peel / Town of Caledon, based on recommendations from a local Conservation Advisory Committee:</u> Not to impact class 1, 2, and 3 land unless landowner compensation is in place. <p>Animal Movement Corridors (Includes amphibian and White-tailed Deer movement corridors amongst more general animal and plant movement corridors): Not to impact class 1, 2, and 3 land unless landowner compensation is in place.</p> <p><u>General Comments:</u></p>

Comment Number	Comment Source	Comments
		<p>Generally the comments for habitat are OK provided that they no not impact class 1, 2, and 3 food producing land. Habitat should never be improved, enlarged or protected unless there is a wildlife management plan in place first and unless there is a full compensation plan in place for predation of crops and domestic animals, lost property value and human and domestic health problems related to wildlife and insects. Water is undervalued in this “habitat study”. Water determines the value of any landscape feature. Water is the most critical element of a habitat; therefore, water protection (springs, seeps and streams) must have the highest priority for protection. Wetlands and habitat can only be preserved if intensive unencumbered food.</p>
Conservation Authorities (CA)		
CA-1	Lake Simcoe Region Conservation Authority (LSRCA)	<p>Significant Woodlands Criteria Size: Critical criterion; should split urban vs. rural to recognize social value of urban woodlands. Rural woodlands should include analysis for large woodlands and areas of higher cover (Big Woods). Minimum size of woodlands in rural areas north of Escarpment should be lowered (perhaps 10ha) as smaller woodlands are likely to have higher function if they are in a forested landscape. Presence of Woodland Interior: Associated with size; agree with 100m. Age and Old Growth: Not practical unless identified specifically and mapped as such. Slope: Would not include as aspect should be captured within larger woodlands. Quality (includes human disturbance): Wouldn’t include as it negates stewardship/restoration opportunities. Linkage: Include, but recognize that linkages only really come into play when there is a proposed land use change or opportunity for stewardship, and there is strong evidence to suggest that we shouldn’t be connecting everything on the landscape. Linking (or reconnecting) should be done thoughtfully and with purpose when appropriate. We use 30m on watercourses as linkages as it fits with the Regulation. Proximity: Include – we used 30m (between Level 1, 2 and 3 features) as it is likely that there is some movement of function (<i>e.g.</i>, feeding birds) between two patches within that distance. Representation (forest community type): No – agree with NS. Representation (age): No, not practical. Ecological Functions: No. Surface Water Quality and Quantity: Include – agree with NS. Groundwater Quality and Quantity: No. Diversity of Communities and Species: No - difficult to measure and implement and not necessarily an indicator of quality or function. Existing Designations: Not, but there should be some overlap. Significant Species and Communities: As it does require field data to apply criterion, it is a reactive criterion (<i>i.e.</i>, can’t be determined until EIS, for example). Could also capture rare communities under SWH. Economic/Social Values: Yes – woodlands within the OP’s urban boundary should be identified as socially</p>

Comment Number	Comment Source	Comments
		<p>significant to recognize the social value of urban woodlands and reduce the pressure to identify ‘significance’ based on ecological function.</p> <p>Floristic Quality Index: No for both FQI and CC – would require extensive fieldwork.</p> <p>Significant Landforms: No – agree with NS.</p> <p><u>Significant Wildlife Habitat Criteria</u></p> <p>Seasonal Concentration Areas:</p> <p><u>Deer Wintering Area:</u> Include Stratum 1 Deer wintering as per MNR if there are any.</p> <p><u>Colonial bird nesting sites (e.g., heronry, gull colony):</u> Include based on data from Bird Studies Canada. We included Double-crested Cormorant. No fieldwork required except to confirm sites.</p> <p><u>Waterfowl nesting habitat:</u> Requires fieldwork.</p> <p><u>Raptor wintering areas (i.e., used for feeding and/or roosting):</u> Requires fieldwork.</p> <p>Seasonal Concentration Areas: No comments.</p> <p>Rare Vegetation Communities or Specialized Habitats for Wildlife:</p> <p><u>Habitat for area-sensitive species</u></p> <ul style="list-style-type: none"> i. <u>Interior Forest Breeding Bird Species</u> ii. <u>Open Country Breeding Bird Species:</u> (Note: “Habitat for area-sensitive open country breeding bird species” has since been changed to “Habitat for open country and early successional breeding bird species”, slightly changing the emphasis of the criterion.) <p>Agree that area-sensitive grassland species are of concern and recommend that large grasslands be incorporated into the Natural Heritage System as SWH rather than based on bird species and numbers of pairs. Forests are covered off under significant woodlands.</p> <p><u>Habitat for wetland breeding bird species:</u> Same comment – incorporate large wetlands that will provide (or are more likely to provide) habitat for these species, rather than based upon bird species or numbers of pairs.</p> <p>Habitat for Species of Conservation Concern Criteria:</p> <p><u>Species identified as nationally “Endangered or Threatened” by COSEWIC which are not protected in regulation under Ontario’s Endangered Species Act:</u> Wouldn’t include as these areas are protected by the PPS anyway and the data cannot be publicly disclosed.</p> <p><u>General Comments:</u></p> <p>Major issue for significant woodlands is the definition of ‘woodland’, i.e., Forestry Act vs. ELC definition.</p> <p>The approach to SWH should be based upon the desired outcome. If the Region/Town wishes to have SWH sites specifically mapped, then an extensive field program will be required to identify SWH based on the guidelines.</p>

Comment Number	Comment Source	Comments
		<p>However, if the Region/Town wishes to identify what is currently identifiable/mappable, and assume that the remainder of SWH is incorporated (to a large extent) within a (the) Natural Heritage System, the criteria will be reduced to those that are currently mappable. Our recommended approach is to map what is known.</p>
CA-2	Credit Valley Conservation (CVC) – informal comments provided by multiple staff	<p><u>Significant Woodlands Criteria</u> Size: Per cent existing forest cover should not be the only criterion to determine minimum size. Watershed targets must be established. If the Credit were to lose all woodlots less 15 ha as suggested for a 30% target we would still be losing woodlots. The Region should not rely on municipalities to make up the difference unless such a target is downloaded and tools such as compensation planting required. Presently the Credit watershed has 20%? forest cover. A significant net gain must be planned for in order to mitigate and adapt to climate change. The Region of Peel is funding and planned for climate change with CVC and TRCA (SSBP). It would be reasonable to discuss a 5ha minimum size, and there could still be a cumulative loss of woodlands. (How much woodland in the watershed is under the size of 5ha and could be lost – and how many trees would we have to plant in compensation?)</p> <p>CVC assumes that there will be consistency in applying the definition of woodlands 1) for calculating total woodland cover in Peel region, and 2) for applying specific criteria related to total cover (for example, woodland size), because 2) depends on 1).</p> <p>The size criterion as presented in the discussion paper is being confounded with the Woodland interior criterion – they need to be considered separately. Woodlands of large size without woodland interior are still valuable in supporting a larger number of species and ecological functions than smaller woodlands (due to the species area relationship). Therefore the size criterion for maintaining species in general (size criterion) may be different from that for maintaining woodland interior dependent species (woodland interior criterion). The size criterion should be dependent not only on existing guidelines but on the range of sizes that currently exists within the Region in order to maintain sustainable populations and ecological functions.</p> <p>Regarding the relationship of size and distribution - Variable criteria for the Size criterion will be critical to ensure adequate distribution of woodlands in Peel. This is important because woodlands in the southern urban or white belt areas of Peel likely perform critical stepping stone functions for existing northward migration of species (<i>e.g.</i>, migratory land birds, plants). These stepping stone habitats are also likely to become important for other species migrating under climate change.</p> <p>Support defining ‘significant’ woodlands based on varying size thresholds depending on the location. Smaller patches in urban areas would be significant and larger patches in more rural areas. Suggest that this division be based not on physiographic boundaries such as watersheds or the escarpment but instead based on Growth Plan</p>

Comment Number	Comment Source	Comments
		<p>boundaries. Areas within the ‘urban’ boundary can have lower woodland significance thresholds (<i>e.g.</i>: 2ha, 4ha) versus those outside of the area. This would effectively protect smaller woodlands in areas that are urbanized already or slated for future development and thus help out with future NHS creation. We may as well protect what we can in these to-be-urbanized areas instead of spending money and effort trying to ‘green’ them later on. These will be the primary areas for the interaction of people and the environment, and having greener cities and more interactions with nature is linked to a better quality of life and appreciation for the natural world.</p> <p>Presence of Woodland Interior: The same concern applies to existing woodland interior habitat. The Credit watershed has approximately 1% of forest interior habitat, and the data are likely similar for Peel region; therefore protecting only woodlands with interior habitat greater than 4ha is inappropriate. Again, an examination of the range of existing interior habitat needs to be made prior to determining an appropriate threshold for Peel. Observations from TRCA support the hypothesis that some area sensitive species may breed in woodlands with smaller interior area.</p> <p>Age and Old Growth: Decision makers need some alternate tool such as tree cutting bylaws, for the public often consider even single old aged trees as significant as natural representatives, local habitat and in having other social values. Any cluster of old age trees constituting a woodlot should be given further consideration (how many are there anyway?).</p> <p>Using “Old Growth” as a criterion would be challenging. Not all information is available on the age and past management practices of each woodland in the region. Also, old growth woodlands can exist as small patches - remnants reduced in size due to development - and may not be captured by the suggested 16ha minimum size ‘needed’ to produce old growth conditions.</p> <p>Slope: Seems like we are relying too much on science with the burden of proof on resource management agencies. Conventional wisdom would tell us a woodlot should not be cut on a steep slope if it is relatively stable and would naturally support sustainable forest cover.</p> <p>Quality (includes human disturbance): Would not recommend using “quality” as a criterion. This is a very subjective measurement, and many of the activities or disturbances that impact the ‘quality’ of a woodland can be changed, removed or mitigated over time (<i>e.g.</i>: recreational use can be banned, garbage and waste can be removed, <i>ad hoc</i> trails can be closed and restored).</p> <p>Linkage: This criterion is essential if ecosystem functions in significant woodlands are to be maintained over the</p>

Comment Number	Comment Source	Comments
		<p>long term. The TEEM documents provided may provide assistance in determining criteria and thresholds.</p> <p>Regional connectivity – woodlands that effectively are within a bioregional corridor: the Credit River valley, NEP, Lake Ontario shoreline, ORM.</p> <p>Proximity: This criterion is essential if ecosystem functions in significant woodlands are to be maintained over the long term. The TEEM documents provided may provide assistance in determining criteria and thresholds.</p> <p>This may effectively make very many woodlands significant, and not be useful to tease out just a subset (if significance is based on meeting “at least one criterion”) especially at Regional level, but may be a consideration.</p> <p>Ecological Functions: TEEM has used a multi-functional approach that can be adopted. There may be some double counting but this is not necessarily indefensible (Aviva?).</p> <p>Surface Water Quality and Quantity:</p> <p>Groundwater Quality and Quantity: Seems like we are relying too much on science with the burden of proof on resource management agencies. Conventional wisdom would tell us a woodlot should not be cut where significant recharge and discharge areas exist and would naturally support sustainable forest cover. These are identified in most subwatershed plans. At the very least any swamps should be recognized as being linked to groundwater.</p> <p>Diversity of Communities and Species: TEEM used matrix influence or size as a surrogate that could be adopted?</p> <p>ELC community series coverage exists for the Region of Peel and can be used to identify woodlands with high community series diversity, as well as natural community series that are rare in Peel (<i>e.g.</i>, those representing less than 5% in area of all natural and cultural communities, such as mixed swamp). Why was it decided not to include ELC community series diversity as a criterion? There are no thresholds in the literature for defining rare communities within a defined area, but there are likely precedents in practice, such as the 5% used in subwatershed studies for CVC.</p> <p>The draft TEEM documents provided suggest viable ways to identify highly diverse areas (for example, using the 75th percentile of ELC community series diversity per woodland patch as a threshold value for diversity,</p>

Comment Number	Comment Source	Comments
		<p>identifying regionally rare natural communities as those that represent less than 5% of existing natural area, etc.).</p> <p>Existing Designations: CVC requests criteria and or examples to define “where appropriate” existing designations will also include woodlands as significant. CVC suspects cases would be rare where woodlots would not be considered an integral, mature or significant part of an ecosystem already designated for protection.</p> <p>The Proximity and Linkage criteria as currently explained in the discussion document will help protect an important function of woodlands in supporting local dispersal of plant and wildlife species. However, the criteria as laid out do not capture the critical role of woodlands in supporting the migration of species, <i>i.e.</i>, the movement of species over larger, regional distances (ORM, Niagara Escarpment, Lake Ontario to ORM/NEC). Adding a criterion for proximity to regional/Provincial corridors or significant valleylands would ensure the migration function of woodlands is taken into account. See related comments on Distribution.</p> <p>Significant Species and Communities: Some incidental sightings may well indicate routine use of an area but by their secretive nature only be observed on rare occasions (<i>e.g.</i>, snakes, turtles, small mammals). Again for some species we are relying too much on science with the burden of proof on resource management agencies. Conventional wisdom would tell us if suitable habitat exists and some species (<i>e.g.</i>, milksnake) are observed incidentally it is likely residing or using the area. Likewise “routinely” might require further definition based on each species habits. Annual and migratory use is provided as an acceptable use but must it be confirmed in each or any year? Some birds such as Osprey can rotate through one or more nesting sites and not “routinely” use each site until disturbed or resources cyclically decline over a number of years.</p> <p>Economic/Social Value: Decision makers need some alternate tool such as tree cutting bylaws, for the public often consider woodlots to be significant as representative communities (especially within urban areas) and in having other social values such as educational opportunities. Any woodlot that is presently publicly accessible and has trails, interpretive or other infrastructure could be considered significant. Recreational impacts does not have to undermine the value given there is always restoration potential especially as woodlots continue to decline. Likewise sustainable harvesting or management as nurse crops for succession to sustainable hardwoods should not discount for significance and future potential.</p> <p>This criterion could assist in protecting smaller, lower quality woodlots within urban boundaries that may not otherwise fall under protection yet perform an important social/educational/psychological/spiritual function for urban inhabitants. For many inhabitants, urban woodlots are their main contact with nature. However, the argument made against including this has some value. Perhaps the City and town municipalities should be</p>

Comment Number	Comment Source	Comments
		<p>consulted further on this criterion as they may have data that would allow this criterion to be applied, at least within urban boundaries.</p> <p><u>Significant Wildlife Habitat Criteria</u> Seasonal Concentration Areas:</p> <p><u>Migratory stopover (or staging) areas: Landbirds / Bats / Butterflies / Waterfowl (Terrestrial) / Waterfowl (Aquatic) / Shorebirds:</u> Regarding Waterfowl Stopover (terrestrial) - Lake Ontario offshore waters is part of CVC jurisdiction under the <i>Conservation Authorities Act</i> and in an agreement with DFO for plan review including municipal activities and approvals. That the municipalities do not have jurisdiction should not matter or CA's should assume the ability to designate areas significant as a similar "planning authority".</p> <p>Regarding Landbirds - A distance based designation is an excellent approach to designating this type of SWH given that there is so little natural or cultural habitat left in these areas.</p> <p>Rare Vegetation Communities or Specialized Habitat for Wildlife:</p> <p><u>Forests providing a high diversity of habitats:</u> Why are cultural woodlands included for consideration when adjacent to a natural area, but not plantations? Bird data from the Credit watershed show that plantations are important foraging habitat.</p> <p>The vector analysis is a good option for determining ELC diversity, but there may need to be different thresholds for urban vs. rural areas to allow for protection of relatively (but not absolutely) high diversity areas in urban or urbanizing zones.</p> <p>The draft TEEM documents provided suggest other ways to identify highly diverse areas (for example, using the 75th percentile of ELC community series diversity per woodland patch as a threshold value for diversity, identifying regionally rare natural communities as those that represent less than 5% of existing natural area, etc.)</p> <p><u>Old-growth or mature forest stands:</u> The significant woodlands and significant wildlife habitat projects need to be developed in tandem. If old growth or maturity is not used as a criterion in identifying significant woodlands, it is essential that it be included as a criterion for significant wildlife habitat.</p> <p>Habitat for Species of Conservation Concern Criteria:</p> <p><u>Species whose populations appear to be experiencing strong declines in Ontario:</u> The goal is long term survival of these populations, with protection put in place before population numbers decline drastically. Therefore, accepting a confidence level of $p < 0.10$ is appropriate as it reflects a more precautionary approach to species protection.</p> <p>Animal Movement Corridors (Includes amphibian and White-tailed Deer movement corridors amongst more</p>

Comment Number	Comment Source	Comments
		<p>general animal and plant movement corridors): The literature and CVC’s habitat utilization data show that certain species can cross open areas. Therefore a strong argument can be made for treating open corridors as SWH, protecting these areas against urbanization, which makes species movement much more difficult.</p> <p>General Comments</p> <ul style="list-style-type: none"> • The number of Counties or Regional Municipalities that have identified significant woodlands is greater than the number of Cities or towns doing the same. The identification of significant woodlands by Peel could reasonably be viewed as possibly the only legislation of this type in the area for the near future, placing the onus on Peel to take a more precautionary approach to identification of significant woodlands for its jurisdictional area. • Consideration needs to be given as to how the final significant woodlands total area and distribution compares with Peel’s long term goals for woodland protection across the Region. • Some mention needs to be made of woodlands lying in hazard lands – they contribute to disturbance regulation functions – and how they are or will be dealt with. • It is not clear whether significant wildlife habitat will be designated entirely through fieldwork, or through a two tier system – some habitat identified for protection through GIS and desktop analysis (<i>e.g.</i>, landbird migratory stopover areas) and other SWH subject to field verification. Some suggestions on the approach would be useful to provide in the discussion document. • Has leopard frog summer foraging habitat also be recommended (as has wild turkey and vulture summer roosting) to be removed for consideration as significant wildlife habitat? Otherwise it should be considered at least in urban areas south of the escarpment. • Migratory butterfly congregations have been observed (and can be documented) along the Lake Ontario shoreline (<i>e.g.</i>, Lakeside Park and Rattray Marsh) before crossing while return trips can be more dispersed. Any natural areas along the shoreline should be considered significant. • Regarding the option to amend the criteria in the future - the NAI program will no doubt be able to provide indications of Biodiversity, community Representation, and FQI across Peel Region. In the future this data should be used to bolster the significance of remaining woodlands. The City of Mississauga has something similar in its NAS whereby in it’s ranking system where FQI is used as a surrogate for (species level) biodiversity and habitat quality. Depending on the FQI certain natural areas are “significant natural areas” and others are simply “natural areas”; however this does not alter the municipal policy implications.

Comment Number	Comment Source	Comments
Development Industry (DI)		
DI-1	Gagnon, Law, Bozzo Urban Planners Ltd.	<p>General Comments: The Region of Peel has a responsibility to ensure that the Official Plan conforms to Provincial Policy. While some stakeholders and agencies might encourage the Region to adopt an “environment first” approach, we strongly recommend that the responsible thing to do is to adopt a “balanced” agenda; one which considers the full scope and breadth of Provincial Policy.</p> <p>Some critics of the Region suggest that there are new advances in “science” which should be recognized and reflected in the revised limits of the Greenlands System and associated policies. The NWBLG caution the Region and believed that the administration must be careful to not adopt purported new advances in “science”. Now is the time to question the efficacy of supposed new advances in “science”. In some instances it appears that some of these new advances in “science” are nothing more than the “wants and desires” of narrow minded special interest groups.</p> <p>While some would suggest that an enhanced Natural Heritage System (planned at a landscape scale that goes beyond the integrated features based planning approach contained within the existing ROP Policy framework) is required, the NWBLG believe that the current system has served the Region well and should be maintained. While some are critical of the Region’s approach, we support it.</p> <p>The current Greenlands System has successfully identified and protected Valleylands, Woodlands and Wildlife Habitat in Peel. It has contributed to the high quality of life enjoyed by the residents of the Region of Peel.</p>
Environmental Groups (E)		
E-1	Caledon Environmental Advisory Committee (CEAC)	<p>Significant Woodlands Criteria</p> <p>Size: Yes, this should be a criterion; however the minimum size should not necessarily be fixed. If there are no other forested areas within a certain distance, then smaller woodlands should be considered significant. Also, the potential of a woodland to be enlarged or joined to nearby wooded areas by afforestation should also be taken into consideration when assessing significance.</p> <p>Presence of Woodland Interior: Yes, this should be a criterion. Need more of this habitat.</p> <p>Age and Old Growth: No, should not be a criterion. The age of a forest is dynamic – one windstorm can turn old growth into immature forest in a matter of hours. Old growth is an important habitat, but a diversity of forest ages is also ecologically important.</p>

Comment Number	Comment Source	Comments
		<p>Slope: No, should not be a criterion. I am not aware of slope having an effect on ecological function.</p> <p>Quality (includes human disturbance): No, should not be a criterion. Degraded forests can be restored, and human activities can be excluded or managed to reduce their impact. Even degraded forests provide some ecological function.</p> <p>Linkage: Yes, this should be a criterion. I assume this criterion is meant to capture the forested areas that may not meet other criterion of significance, but that that link significant forest areas or create significant forests by their linkage.</p> <p>Proximity: Yes, this should be a criterion. It eliminates the argument used by some that a little gap (20 m or less) fractures a forest area and makes it less important. Also the potential to afforest the gap between proximate forests and create a larger block should be considered.</p> <p>Representation (forest community type): No, should not be a criterion. There is not enough forest left on the landscape to start picking & choosing a sampling of forest types. The focus should be on contiguous, functional natural areas.</p> <p>Representation (age): No, should not be a criterion. See comment under “Old Growth” above. A diversity of forest ages on the landscape provides better ecological function.</p> <p>Ecological Function: No, should not be a criterion. All wooded areas have an ecological function on the landscape, and all have the potential to be restored or otherwise have their ecological functioning improved.</p> <p>Surface Water Quality and Quantity: Yes, should be a criterion.</p> <p>Groundwater Quality: Not sure – what about forests on known groundwater recharge areas, well head areas or areas of high aquifer vulnerability?</p> <p>Diversity of Communities and Species: No, should not be a criterion. Some types of forests are naturally less diverse, and some have had their diversity altered <i>e.g.</i>, by logging, maple sugar bush management, grazing, overuse by people, or by disease or insect outbreaks.</p> <p>Existing Designations: Can’t comment because I don’t know what kind of existing designations there can be.</p>

Comment Number	Comment Source	Comments
		<p>Significant Species and Communities: Yes, should be a criterion. Wouldn't many of the Significant Wildlife Habitat criterion be captured here?</p> <p>Economic/Social Value: No, should not be a criterion. Economic and social values are provided by forests, but a forest that does not overtly provide economic (<i>e.g.</i>, logging, tourism, etc.) or social (<i>e.g.</i>, trails or proximity to settlements) are nevertheless contributing to environmental health.</p> <p>Floristic Quality Index: No, should not be a criterion, for the same reasons as quality (disturbance) and diversity should not be criterion.</p> <p>Significant Landforms: No, should not be a criterion. Other designations already capture landforms.</p> <p>General Comments: I have not commented on the Significant Wildlife Habitat criteria since my expertise is mainly in forested ecosystems, however there is clearly an overlap between significant woodlands and significant wildlife habitat. Perhaps to simplify the significant wildlife habitat criteria, the significant wildlife habitat criteria should concentrate on non-forested significant habitat, and a criterion added to the significant forests criteria for significant wildlife habitat in forests (in addition to the significant species criteria).</p>
E-2	Alton-Grange Association – comments	<p>Significant Woodlands Criteria</p> <p>Size: Since the top end of Caledon is the only remaining “natural land” area supporting the watershed, this criterion should be included with a high threshold. Will the CVC’s under way study of sensitive areas be able to help here?</p> <p>Presence of Woodland Interior: Support this criterion. The Summary Table suggests that data collection is not necessary. If interior forest is rare in this jurisdiction it would be prudent to get these sites identified as soon as possible. A 0.1 ha site is limited ecologically. How much of this will apply?</p> <p>Age and Old Growth: Old growth genetic stock is worth protecting whatever remains. Support for collecting field data is needed for this one especially if the old growth tends to consist of narrow stands in valleys. How will the complexity of mature/maturing categories be reflected?</p> <p>Slope: A lot of the wooded landscape in this area has been shaped by glacial action. Trees that have populated the slopes of small, sharp, deep valleys, swales and ravines are worth protecting to prevent erosion and negative</p>

Comment Number	Comment Source	Comments
		<p>impacts on water quality. Data collection is required for this one.</p> <p>Quality (includes human disturbance): Will the results of the CVC sensitive areas study help with determining the need for this criterion.</p> <p>Linkage: As there can be many potential ecological functions to assess or oversimplify anything could be captured under these criteria. Having such criteria is only worth it if detailed ecological investigation is undertaken. The scale at which these assessments are done is also important for determining which species guilds or meta-populations can benefit from it. Width and length and composition all interact to make the linkage function and these all have to be assessed.</p> <p>Proximity: Same comment as for Linkage.</p> <p>Representation (forest community type): Support his criterion until consultant has clarified how “rare woodland communities should be captured by this or another criterion. If rare forest community types exist they should be protected.</p> <p>Representation (age): Could this be covered by Age and Old Growth and Representation (forest community type)? Still think it is critical to have the data. Age and extent of forest cover helps determine key component of health of watershed.</p> <p>Ecological Function: This is redundant with other criteria so it introduces a bias towards significance. It would also require extensive ecological study, which if done might show significance, in which case, this one criterion might replace a number of others.</p> <p>Could key ecological functions be captured in a set of objectives that are directed at an overall intent <i>e.g.</i>, linking the health of the natural environment to the health of the watershed and ultimately to water quality?</p> <p>Surface Water Quality and Quantity: Regional, surface and groundwater functions of woodlots are a large scale assessment of the value of tree cover and cannot be addressed as criteria for individual woodlots. This should only be done at a regional level as an area target in watersheds.</p> <p>Groundwater Quality and Quantity: same comment as above. Critical to have seeps/spring data which is currently absent. How does this relate to the requirements /provisions of the <i>Clean Water Act</i> per source</p>

Comment Number	Comment Source	Comments
		<p>characterization and protection?</p> <p>Diversity of Communities and Species: True scientifically established diversity indices are useful in determining woodland significance but require extensive study.</p> <p>Existing Designations: Introduces bias towards significance.</p> <p>Significant Species and Communities: Rare species are protected by other mechanisms—however to establish scientifically defensible criteria for the number and rarity level warranting protection extensive study would be required.</p> <p>Economic/Social Value: Would the intent of such a criterion be captured in any objective/goal statement as per comments for Ecological Functions?</p> <p>Floristic Quality Index: No comment.</p> <p>Significant Landform: Disagree with the Consultant’s recommendation. See comments for Slope.</p> <p><u>Significant Wildlife Habitat Criteria</u></p> <p>Seasonal Concentration Areas:</p> <p><u>Deer wintering area:</u> Support criterion. Population threshold should be set so that populations are controlled. Without such controls deer can become an economic liability for food producers and a safety hazard.</p> <p><u>Colonial bird nesting sites (e.g., heronry, gull colony):</u> Support criterion as long as data is collected that supports same. Do not support including the Cormorant.</p> <p><u>Waterfowl nesting habitat:</u> Support criterion.</p> <p><u>Raptor wintering areas (i.e., used for feeding and/or roosting):</u> Support criterion.</p> <p><u>Migratory stopover (or staging) areas: Landbirds / Bats / Butterflies / Waterfowl (Terrestrial) / Waterfowl (Aquatic) / Shorebirds:</u></p> <p>Support criterion. Agree with focus on lands under public-ownership. Data collection is critical as it could help identify privately owned lands to be acquired should “significant” areas be identified.</p> <p><u>Snake hibernacula:</u> Support criterion.</p>

Comment Number	Comment Source	Comments
		<p><u>Bat maternal roosts and hibernacula</u>: Support criterion and collection of data to determine threshold.</p> <p><u>Bullfrog concentration areas</u>: Support criterion.</p> <p>Rare Vegetation Communities or Specialized Habitat for Wildlife:</p> <p><u>Rare vegetation communities</u>: Support criterion. If overlap with significant woodlands exists please address by collapsing but without losing the intent/desired level of protection.</p> <p><u>Forests providing a high diversity of habitats</u>: see above.</p> <p><u>Old-growth or mature forest stands</u>: see above.</p> <p><u>Foraging areas with abundant mast (i.e., fruit-bearing trees or shrubs)</u>: Agree with recommendation as long as intent of this criterion is captured in the most suitable alternative.</p> <p><u>Cliffs and caves</u>: Support criterion.</p> <p><u>Seeps and springs</u>: Support criterion. Identifying these features should be a priority before it is too late. They play a key role in the health of the watershed.</p> <p><u>Amphibian breeding habitat</u>: i. Forested sites (e.g., vernal pools) / ii. Non-forested sites (e.g., marshes): Support criterion. Again field data should be supported.</p> <p><u>Turtle nesting habitat and turtle overwintering areas</u>: Support criterion. Don't agree with consultant's comments about road/rail sides being exempt. Would this not preclude any opportunities to create some form of mitigation e.g., a turtle crossing tunnel?</p> <p><u>Habitat for area-sensitive species</u>: i. Interior Forest Breeding Bird Species / ii. Open Country Breeding Bird Species: (Note: "Habitat for area-sensitive open country breeding bird species" has since been changed to "Habitat for open country and early successional breeding bird species", slightly changing the emphasis of the criterion.)</p> <p>Support criterion and agree with consultant's comments.</p> <p><u>Habitat for wetland breeding bird species</u>: Support criterion and gathering of field data given status of some of the identified species.</p> <p><u>Raptor nesting habitat</u>: i. Raptors assoc. w/ wetlands, ponds, and rivers / ii. Raptors assoc. w/ woodland habitats: Support criterion.</p>

Comment Number	Comment Source	Comments
		<u>Mink, River Otter, Marten, and Fisher denning sites</u> : Support criterion.
E-3	Credit River Alliance	<p><u>Significant Woodlands Criteria</u></p> <p>Size: Yes – important-maybe lower thresholds to encourage more stands? We need all the trees we can get for human health and carbon sequestration.</p> <p>Presence of Woodland Interior: Yes – important.</p> <p>Age and Old Growth: I think we should develop data on this as old growth forests support important habitat for certain species. Also found in NEC areas, other than valleys. Important to make a start on this inventory and develop policy to identify.</p> <p>Slope: Important regarding water dynamics.</p> <p>Linkage: Yes – very important and ties into wildlife habitat and corridors – use ORMP</p> <p>Proximity: Use ORMP precedents – look at context too.</p> <p>Surface Water Quality and Quantity: Yes – very important for ecological function.</p> <p>Groundwater Quality and Quantity: This is very important. Only ignore as a criterion if you are capturing seeps and springs (for sure) – everything depends on surface and groundwater so muse make sure it is captured.</p> <p>Significant Species and Communities: Yes – very important to get on with.</p> <p>Economic/Social Value: Yes – in terms of human health and carbon sequestration.</p> <p><u>Significant Wildlife Habitat Criteria</u></p> <p>Seasonal Concentration Areas:</p> <p><u>Deer wintering area:</u> Yes if it fits with “Natural Heritage Systems” approach.</p> <p><u>Colonial bird nesting sites (e.g., heronry, gull colony):</u> Yes.</p> <p><u>Waterfowl nesting habitat:</u> Yes.</p> <p><u>Raptor wintering areas (i.e., used for feeding and/or roosting):</u> Yes.</p>

Comment Number	Comment Source	Comments
		<p><u>Migratory stopover (or staging) areas: Landbirds / Bats / Butterflies / Waterfowl (Terrestrial) / Waterfowl (Aquatic) / Shorebirds: Yes to all. Provides key linkages for wildlife to survive.</u></p> <p><u>Snake hibernacula: Yes.</u></p> <p><u>Bullfrog concentration areas: Yes.</u></p> <p>Rare Vegetation Communities or Specialized Habitat for Wildlife:</p> <p><u>Rare vegetation communities: Yes.</u></p> <p><u>Forests providing a high diversity of habitats: Yes.</u></p> <p><u>Old-growth or mature forest stands: Yes.</u></p> <p><u>Cliffs and caves: Yes.</u></p> <p><u>Seeps and springs: Yes – for sure – very NB.</u></p> <p><u>Amphibian breeding habitat - i. Forested sites (e.g., vernal pools) / ii. Non-forested sites (e.g., marshes): Yes.</u></p> <p><u>Turtle nesting habitat and turtle overwintering areas: yes.</u></p> <p><u>Habitat for area-sensitive species: i. Interior Forest Breeding Bird Species / ii. Open Country Breeding Bird Species: (Note: “Habitat for area-sensitive open country breeding bird species” has since been changed to “Habitat for open country and early successional breeding bird species”, slightly changing the emphasis of the criterion.) Yes – We are losing numbers of these species because of declining habitat.</u></p> <p><u>Habitat for wetland breeding bird species: Yes.</u></p> <p><u>Raptor nesting habitat - i. Raptors assoc. w/ wetlands, ponds, and rivers / ii. Raptors assoc. w/ woodland habitats: Yes.</u></p> <p><u>Mink, River Otter, Marten, and Fisher denning sites: Yes.</u></p> <p>Habitat for Species of Conservation Concern Criteria:</p> <ol style="list-style-type: none"> 1. <u>Species identified as nationally Endangered or Threatened by COSEWIC which are not protected in regulation under Ontario’s Endangered Species Act: Yes.</u> 2. <u>Species identified as Special Concern based on Species at Risk in Ontario List that is periodically updated by OMNR: Yes.</u> 3. <u>Species that are listed as rare (S1–S3) or historical in Ontario based on records kept by the Natural</u>

Comment Number	Comment Source	Comments
		<p><u>Heritage Information Centre in Peterborough</u>: Yes.</p> <p>4. <u>Species that have a high percentage of their global population in Ontario and are rare or uncommon in the Regional Municipality of Peel / Town of Caledon</u>: Yes.</p> <p>5. <u>Species that are rare within the Regional Municipality of Peel/Town of Caledon, even though they may not be Provincially rare</u>: Yes.</p> <p>6. <u>Species that are subjects of recovery programs (e.g., Black Duck)</u>: Yes.</p> <p>7. <u>Species considered important to the Regional Municipality of Peel / Town of Caledon, based on recommendations from a local Conservation Advisory Committee</u>: Yes.</p> <p>Animal Movement Corridors (Includes amphibian and White-tailed Deer movement corridors amongst more general animal and plant movement corridors): Yes – we need to make a start on targets.</p> <p>General Comments:</p> <p>Thank you for giving me a chance to participate. Halton Region has done some good work on significant woodlands. Have you looked at their thresholds? I like the ORMP thresholds too. Very important to be utilizing “Natural Heritage Systems Approach” which is now recognized in the PPS and recent OMB decisions. Good standard to move forward. For the best standards going forwards we need to use the best science and incorporate it now. Peel and Caledon are doing the right think to move this yardstick forward now, as we can’t afford to wait 5 years. We are losing habitat quickly. We should be using CVC’s Natural Areas Inventory (NAI), the “Terrestrial Ecosystems Enhancement Model” (TEEM) and their terrestrial and water monitoring work and standards. I think it would be helpful going forwards and future workshops or public forums to have CVC attending and talking about these things. It would answer some questions before they are asked.</p>
General Public (GP)		
GP-1	City of Brampton Resident	<p>Significant Woodlands Criteria</p> <p>Size: Recommend ELC definition of “existing woodland”</p> <p>In the urban areas of Peel, even the smallest woodlands are valuable, for supporting both wildlife and human health.</p> <p>Recommend focus on restoration, renaturalization, protection, and extension of woodlands, especially in urban areas, as well as enhancement of links with wetlands and watersheds.</p> <p>Presence of Woodland Interior: Protection of woodland interior is also essential, through a dedicated trail system that prevents destruction of wildlife and wildlife habitats.</p>

Comment Number	Comment Source	Comments
		<p>Age and Old Growth: Citizens can be engaged in locating, identifying, and establishing protections for large, old and old-growth trees and woodlots in their neighborhood, especially urban neighborhoods.</p> <p>Slope: Woodlands on a slope may hold soil to prevent erosion, hold water in underground aquifers, protect flood plain and wetlands from detrimental impacts of urbanized areas, and/or provide necessary linkages for wildlife with other natural features.</p> <p>Quality (includes human disturbance): Mixed forest or woodlands are stronger and healthier than a mono-culture such as a plantation, <i>e.g.</i>, resistance to pests. Dedicated trail systems can keep people and pets back from areas that need to be restored.</p> <p>Linkage: Linkages of woodlands to wetlands and watersheds are particularly important to protect movement of wildlife through natural habitats. Extensive ongoing study would determine each species’ needs, but the most immediate concern would be to respect and protect the diversity and integrity of wildlife habitats in woodlands and adjacent natural areas. Healthy natural environments are necessary to provide cleaner air, potable water, healthy soil, and a healthy climate for human communities.</p> <p>Ecological Functions: Healthy natural environments are necessary to provide cleaner air, potable water, healthy soil, and a healthy climate for human communities. We need to reduce our carbon footprint. Woodlands, wetlands and watersheds will do this for us naturally!</p> <p>Surface Water Quality and Quantity: Water needs to follow its natural course through streams, reservoirs, aquifers, wetlands, meandering courses and woodland areas, in order to be healthy for humans and wildlife. Toxics must be kept away, as far as possible. Our water treatment systems cannot continue to effectively clean water for safe human consumption if natural waterways are more and more increasingly burdened with pollution and depletion.</p> <p>Groundwater Quality and Quantity: Above.</p> <p>Diversity of Communities and Species: See comments related to Diversity and Linkage.</p> <p>Significant Species and Communities: Agree with importance of developing regionally significant fauna list for Peel and larger area, as well as regionally significant vegetation, using CVC, TRCA, and other available</p>

Comment Number	Comment Source	Comments
		<p>resources.</p> <p>Economic/Social Value: Healthy natural environments are necessary to provide cleaner air, potable water, healthy soil, and a healthy climate for human communities. We need to reduce our carbon footprint. Woodlands, wetlands and watersheds will do this for us naturally!</p> <p><u>Significant Wildlife Habitat Criteria:</u></p> <p>Seasonal Concentration Areas:</p> <p><u>Deer wintering area:</u> Health and linkages of woodlands and waterways a critical factor.</p> <p><u>Colonial bird nesting sites (e.g., heronry, gull colony):</u> Health and protection of habitats critical. Agree with emphasis on wildlife-friendly management in agricultural areas, as well as seeking support of R.O.M., TRCA, CVC.</p> <p><u>Waterfowl nesting habitat:</u> Naturalized areas act as buffers, e.g., along Etobicoke Creek in Brampton from Queen south to Steeles. Continue to establish these and enlist support of citizens.</p> <p><u>Migratory stopover (or staging) areas - Landbirds / Bats / Butterflies / Waterfowl (Terrestrial) / Waterfowl (Aquatic) / Shorebirds:</u></p> <ul style="list-style-type: none"> • Loss of suitable open water due to intense urbanization is a problem for waterfowl • Loss of forest cover, natural vegetation and “countryside” due to urban sprawl is a problem • Continue to build citizen awareness through your helpful publications, events, links with schools and other forms of outreach. <p><u>Snake hibernacula:</u> Same as above.</p> <p><u>General Comments:</u></p> <ul style="list-style-type: none"> • It is very gratifying to see how much work Peel Region, CVC, TRCA and our other environmental partners are doing to protect our natural environment. • I am concerned at the lack of time provided to get this information out to others and to afford them the opportunities to give input on this critical topic. • I feel that the comments I have provided here are very limited and incomplete. • Thank you for the opportunity to be involved in this study. I look forward to future meetings.

OPEN HOUSES

3.0 Summary of Comments Received from the Public Open Houses

Three open-houses were held; one in each area municipality:

- June 24, 2008 (6:00 to 9:00 p.m.) – Caledon Community Complex, Town of Caledon
- June 25, 2008 (4:00 to 8:00 p.m.) – City Hall Atrium, City of Brampton
- June 26, 2008 (3:00 to 7:00 p.m.) – Mississauga Central Library Atrium, City of Mississauga

The Town of Caledon open house included a presentation by the consultant team followed by a facilitated question and answer period. The open houses in the Cities of Brampton and Mississauga did not include a presentation by the consultant team; however both Regional staff and a principal staff member from North-South Environmental Inc. were present at the open houses to answer questions from the public.

Questions from the public at the open houses primarily related to the study process and general questions about the Peel Region Official Plan Review (PROPR). Preliminary mapping of woodland cover and a summary of the draft recommended criteria and thresholds for identifying significant woodlands and significant wildlife habitat were displayed. Comment sheets and background information was distributed to interested members of the public.

Below is a summary of comments and questions that were received by the project team following the consultant's presentation at the Town of Caledon open house.

Town of Caledon Open House – June 24, 2008 (6:00 to 9:00 p.m.)

Question: Does the woodland have to satisfy all recommended criteria to qualify as a “significant” woodland?

Answer: The recommendation is that only one criterion needs to be met. Some of the preliminary criteria were rejected due to lack of information or other valid reasons.

Question: Could you describe how you came up with the woodlands definition?

Answer: There is a provincial methodology for describing woodlands through the Ecological Land Classification or ELC, which defines a “woodland”. There are also definitions provided in the *Forestry Act* and the Oak Ridges Moraine Technical Guidelines. The definition for woodlands used in this study draws upon these technical sources.

Question: There is a chunk of land east of Hwy 50, within the Palgrave residential estate area. Is the forest in this area open to development?

Answer: This area is a recognized area under Oak Ridges Moraine Conservation Plan. Natural heritage in this area, including forests are protected under a different framework and as such is recognized differently than the rest of Caledon. Development applications affecting significant

woodlands within the Oak Ridges Moraine Plan Area may require a more stringent environmental assessment than for the rest of Caledon.

Question: How does a hectare translate into acres?

Answer: 2.47 acres.

Comment: Economic value should not be a criterion for significant woodlands, because if a landowner is harvesting the woodlot for lumber than it is not significant.

Response: The consideration for economic value comes from Provincial direction provided by the Provincial Policy Statement (PPS), which is something all municipalities have to follow. Strictly speaking economic value has to be considered, because the PPS has identified it as a characteristic of significant woodlands. However, economic value may be more relevant to commercial logging operations in northern Ontario and perhaps not so relevant to the Town of Caledon and Peel Region.

Question: Where can I find out if my little piece of land has a significant woodland or significant wildlife habitat?

Answer: Right now, we are still developing criteria and thresholds, so there are no policy designations at this point. We are using GIS analyses and a desktop exercise to illustrate how this can be applied on the landscape. When we move to the policy component we will refine this data based on further stakeholder consultation and at that point if you would like us to take a closer look at your property we will be able to do so. Keep in mind that some data for significant wildlife habitat is confidential for species that are identified as endangered or at risk.

Question: Why would an endangered species be a part of confidential information?

Answer: The Natural Heritage Information Centre will make some information available; however, they keep information confidential to protect species at risk.

Comment: If there was a certain level of compensation to landowners for having these habitats on their properties, then you would not have to worry about the destruction of the habitat. This is where it is important for provincial policy to provide compensation to landowners.

Question: Will these criteria be updated?

Answer: The Region and Town will decide which criteria to adopt within their Official Plans as policy. Official Plans are reviewed every five years, and at that time the criteria may be examined if needed. The data used to support the criteria is updated as new information is gathered.

Question: How does someone challenge the designation or mapping on their property?

Answer: The map is just a representation of policies and there will always be scientists to question the maps. Municipalities do their best to refine the data as much as possible but there is no guarantee that all layers are 100% accurate. The boundaries are verified at the site level through a natural heritage study if required as part of a development application. Also, when the open houses for the Region and Town's natural heritage policy reviews are held, landowners will have an opportunity to view the mapping. Currently, data is available to map significant woodlands, but not significant wildlife habitat.

Question: Why is migratory landbirds stopover area not applicable for the Town of Caledon?

Answer: Primarily because migrating landbirds concentrate on the Lake Ontario shoreline within Peel. The area within the first few kilometers of the shoreline is significant for these migratory birds because they seek refuge in these areas.

Question: What about river valleys as migratory routes? Certainly the Humber River all the way to Hwy 9 is a migratory route where you find landbirds.

Answer: That is a good observation. Valleylands closer to Lake Ontario are more significant, because migrating landbirds are looking for a resting place closer to the shoreline before they continue their journey.

DRAFT TECHNICAL REPORT

4.0 Stakeholder Comments Received on the “Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study Draft Report”, Dated July 10, 2008

Comment Number	Stakeholder Agency	Comment Received	Response	Relevant Changes	Draft Report Page Number
1.	Caledon Environmental Advisory Committee (CEAC)	Add CEAC to list of stakeholders on page 18	Added	Added; recognized as municipal advisory committee to Caledon Council.	Page 18
2.		Minor wording change to specify “Peel Region”	Change noted and made	“In terms of the designated areas and natural heritage features <u>within Peel Region</u> , the following are notable points:”	Page 33
3.		Identify that <i>Municipal Act</i> grants authority to pass tree by-laws	The focus of statement is the definition of woodlands in the Forestry Act and ORM Act. Therefore, removed mention of tree by-laws as to not confuse the reader.	“Also, there is a definition for woodlands provided in the <i>Forestry Act</i> that is used for developing tree by-laws and which is the basis for the definition in the ORM Act.”	Page 39
4.		More emphasis on the role forest configuration plays in the presence of interior habitat.	Added a sentence to emphasize this point.	“It is important to note the relationship between interior woodland, size and shape. <u>Configuration of the woodland plays a large part in the presence of woodland interior conditions and therefore interior habitat.</u> ”	Page 45
5.		Minor wording change regarding commercial forest operations.	Add phrase “on-going or annual” to second last paragraph on page 64	“Despite its merits...there are few (if any) forest blocks in single ownership that are large enough for <u>on-going or annual</u> commercial forest operations.”	Page 64
6.		General comment – highlight that the purpose of the study is to inform policy setting, but not set the policy itself, and to summarize public consultation methods in a preamble.	An Executive Summary is being added to the report that will highlight the purpose of the study and public consultation methods.	To be made in a new Executive Summary	N/A
7.		Suggested that Northern Rough-winged Swallow threshold be reduced from 3 to 1 because these swallows are most often found nesting singularly.	The particular version of this criterion circulated at the time was in error. Regardless, reducing the threshold to one was thought to be too severe.	None.	Page 100
8.		Suggested that Bank Swallow threshold of 1 will likely not occur as these swallows are most often found nesting in colonies for 20 or more.	Again, the particular version of this criterion circulated at the time was in error. The threshold for Bank Swallow was set at 30.	None.	Page 100
9.		Suggested that Bobolinks be included in list of colonial nesting birds.	Upon significant discussion and consideration it was decided that Bobolink should not be added to the list of colonial nesting birds, at least at the moment. There did not seem to be unanimity in the literature with respect to it being designated as such. In addition, more research would have to be conducted to determine what an appropriate threshold would be for the Region of Peel or Town of Caledon. It is	None.	Page 101

Comment Number	Stakeholder Agency	Comment Received	Response	Relevant Changes	Draft Report Page Number
			important to note that this species is also on the list of species for the "Habitat for Open Country and Early Successional Breeding Bird Species" criterion.		
10.		"It is recommended that all "natural areas" be identified as SWH within: b) river valleys within 5 km of Lake Ontario". Suggested that river valleys further than 5 km for Lake Ontario including Credit and Humber River valleys are SWH because these are known migratory routes of Common Loons, Turkey Vultures and Broad-winged Hawks. We are aware that these species will seldom land in the valleys and creeks but observations of waterbirds and raptors using the riverine habitat during migration have occurred.	We appreciate what is being conveyed but disagree that areas of river valley more than 5 km from Lake Ontario should merit SWH status.	None.	Page 107
11.		Suggested that although there may or may not be migratory Monarch Butterfly stopover areas within Caledon further surveys need to be done and SWH occurs within Caledon as milkweed summer breeding habitat for Monarch Butterflies.	Despite the fact the milkweeds are common in the Town of Caledon, we do not feel this has any bearing on the potential of the Town of Caledon to support migratory butterfly stopover areas. This criterion is predominantly influenced by its proximity to Lake Ontario and the Town of Caledon is simply too far away to concentrate Monarch numbers in any significant way.	None.	Page 113
12.		There are indeed existing areas within Caledon that meet these requirements that include all the birds in Group A such as colonial nesting of Bobolinks and Group B such as Clay-colored Sparrow. Suggested that Yellow-billed and Black-billed Cuckoo be included in Group B where nesting has been found in Caledon.	Yellow-billed Cuckoo and Black-billed Cuckoo are more shrubland species than early succession species.	None.	Page 138-139
13.		Suggested that Turkey Vulture be included in list of raptors in Section 1.1.1 Raptor nesting habitat (Raptors associated with woodland habitats).	We are considering this suggestion.	None.	Page 141
14.		" in virtually all cases there is not [sic] comprehensive Region or Town-wide mapping for any of these species" The Canadian Wildlife Service and Natural Resources Canada may have done some comprehensive mapping in partnership with the provinces, therefore perhaps this information exists.	This seems unlikely but it should be confirmed at some later date.	None.	Page 143
15.	Don Lobb, Rural Resident	Re: Age and Old Growth – a young rapidly growing managed forest contributes more to air quality and the economy.	This is not necessarily so as mature forests represent larger carbon storage sinks and some air quality functions are proportional to leaf area, which is greater in mature woodlands. It is a difficult call to definitely say which	None	---

Comment Number	Stakeholder Agency	Comment Received	Response	Relevant Changes	Draft Report Page Number
			contributes the most.		
16.		Re: Linkage – this contributes to wildlife movement and not forest quality. Wildlife movement can be a detriment to agriculture and to human health.	From an ecological perspective, the linkage role of woodlands is an important function and thus merits consideration. We recognize that wildlife can be a nuisance and an economic issue, especially for farmers and nurseries and this should be addressed as part of a balanced policy	None	---
17.		Re: Size – proposal is OK; however, proximity is an issue regarding farms.	Existing agricultural activities will not be impacted.	None.	---
18.		Re: Proximity – Large forest blocks in close proximity to populated areas will bring nuisance wildlife. Tree plantations of any size are good for human well-being.	The issue of nuisance wildlife is subjective, many people welcome the wildlife, while others regard it as a problem, thus it is difficult to address this issue. The value of plantations is implicitly identified in the report through their inclusion as woodlands.	We will check to ensure the value of plantations is adequately recognized	---
19.		Re: Surface water quality and quantity – large and medium size forest encourage more wildlife which degrade water quality. Forests do not create water and they are heavy water users. The benefit are more hypothetical than real.	We recognize that some wildlife can negatively affect some aspects of water quality (e.g. giardiasis, or 'beaver fever'), however, such concerns need to be balanced by the tremendous positive benefits of woodlands and are not a reason for not protecting them. I do not think it is fair to say that wildlife degrades water quality per se. We do agree about the hypothetical benefits, although forests do not “create water”, and they do evapotranspire water, overall they certainly contribute positively to maintaining healthy hydrological systems – see 5.3.11 and 5.3.12	There is adequate discussion of woodlands and hydrology in the report.	---
20.		Re: Significant species and communities – do not protect species if Peel is a fringe area rather than normal environment.	Species on the edges of their ranges need to be protected for a variety of reasons related to biodiversity conservation, maintaining genetic diversity allowing for evolution, and allowing for changes in range in response to climate shifts.	None	---
21.		Re: Deer wintering area – these should be discouraged as deer are now nuisance wildlife	MNR requiring protection of deer wintering areas – they are developing mapping for Peel	None.	---
22.		Re: Colonial bird nesting sites – not compatible where surface water is used by horses or livestock	Existing agricultural activities will not be impacted.	None.	---
23.		Re: waterfowl nesting habitat and all remaining criteria in A and B categories – not to limit food production agriculture or to decrease property value unless full compensation is provided.	Existing agricultural activities will not be impacted.	None.	---
24.		Re: criteria for C – national and provincial protection is sufficient. The residents of Peel do not need an extra layer of regulations.	Local and Regional level protections are already required by the Province in the Provincial Policy Statement. The criteria recommended under Section C of the draft study report are the same listed in the Significant Wildlife Habitat Technical Guide prepared by the Province. No additional criteria are being recommended.	None.	---

Comment Number	Stakeholder Agency	Comment Received	Response	Relevant Changes	Draft Report Page Number
25.		Re: D1 – these must not interfere with food production agriculture or bring risk to human health or result in property damage.	Existing agricultural activities will not be impacted.	None.	---
26.		General comment – no protection or increase in woodlands or habitat should occur: 1) until a wildlife management agreement has been developed with MNR (with consultation from affected landowners); 2) until a full and fair compensation program is in place for property damage and degraded property value; 3) on class 1, 2, 3 agricultural food producing land.	It is not clear what a “wildlife management agreement” means. In general, having a wildlife management plan would be helpful and MNR staff could assist in its development. However, we are not sure if (a) this is within MNR’s mandate, and (b) whether they would have the financial or staff resources to help. We are not aware of any requirement for financial compensation. Existing agricultural activities will not be impacted.	None.	---
27.	Alton-Grange Association (AGA)	Re: Slope – important to have a criterion that addresses slope. Given the unique topography in the upper area of the Credit Valley Watershed, the AGA believes that such criterion will help reduce erosion and protect overall water quality.	Although slope as a criterion for woodlands significance is not recommended, we agree that that criterion does offers some natural heritage protection and is best addressed as part of the overall natural heritage policy review for the ROP and Town OP.	None.	---
28.		Re: Significant Groundwater Resources – AGA does not agree that because this criterion may be difficult to defend it should be rejected. The <i>Clean Water Act, 2006</i> , created the Credit Valley Source Protection Area and made the CVC responsible for it. Woodlands are an important part of appropriate criterion to address significant groundwater resources.	Although groundwater resources as a criterion for woodlands significance is not recommended, we agree that that criterion does offers some natural heritage protection and is best addressed as part of the overall natural heritage policy review for the ROP and Town OP. Groundwater resources may be best addressed through the water resource policy review as part of PROPR and Town’s PPC.	None.	---
29.		Re: Economic and Social Value – Peel projected population will place incredible pressures on the remaining natural heritage system in Peel Region. Draft report does not recommend including a social/economic criterion owing to difficulties in application. What mechanisms can authorities such as CVC, MNR, the Region, Town of Caledon, etc., put in place to ensure the protection and enhancement of “the carrying capacity” of significant natural systems?	Although economic and social values as a criterion for woodlands significance is not recommended, we agree that that criterion does offers some natural heritage protection and is best addressed as a criterion for identifying locally significant woodlands. The area municipalities in Peel may chose to develop local criteria and thresholds to identify locally significant woodlands and may wish to include economic and social criteria. The report does make the recommendation that the protection of significant woodlands for social and economic values is to be determined at a local level. In terms of the carrying capacity of the watersheds in Peel, this will be examined after the PROPR process is completed and work on a Greenlands System Strategy for Peel is developed.	None.	---
30.	Toronto and Region	Requests that both the final study document and the related policy work indicate that the criteria and	Understand TRCA’s wish for flexibility. However, as SW & SWH criteria and thresholds will become policy within the	None.	---

Comment Number	Stakeholder Agency	Comment Received	Response	Relevant Changes	Draft Report Page Number
	Conservation Authority (TRCA)	thresholds to identify SW & SWH may be amended from time to time, based on updated science, without the need for an official plan amendment.	ROP and Town's OP, an amendment will be necessary and stakeholder involvement at that time will be essential. Should mapping be included within the OPs, updated data may not warrant an OP amendment.		
31.		Prefers Option 2 for size which is physiography and historical basis	Will consider comments when developing policy.	None.	---
32.		Requests that policies for SW direct local municipalities to develop their own local thresholds based on local significant, abundance, and other factors (such as social/amenity criteria) to ensure that woodlands patches < 4 ha can be protected as SW through the local OPs.	Will consider comments when developing policy.	None.	---
33.		SWH –it may be appropriate to develop different thresholds for different physiographic areas (as done for SW). However, using ORM thresholds in areas that do not have the extent of habitat the Moraine has, is not appropriate. By setting thresholds so high you would likely only captures ORM habitats while the rare populations further south would go unrecognized.	There are other factors such as geology, climate and hydrology which are important in determining the vegetation and therefore wildlife species an area can support. However, wildlife species are equally, if not more affected by human development patterns and land use. Land use patterns often correspond with physiographic areas but do not always match. Although, the southern part of Caledon is composed of the till plain, the majority is still moraine or escarpment. Each criterion was considered individually in terms of how appropriate it was to apply the Oak Ridges Moraine thresholds on a Region-wide basis. All of them seemed reasonable. All of the thresholds can be further scrutinized as additional information is available in the future, but the ORM thresholds are an appropriate starting point.	None.	---
34.		Use of TRCA species of conservation concern when considering various criteria	Report refers to a regional species of conservation concern list – when TRCA's list is completed, the Region and Town will consider using it as the regional list.	None.	---
35.		Number of patches and average size attributed to Caledon are really the Regional numbers	Agreed - thank you	Text amended to be consistent with table.	Page 26, second last paragraph
36.		Section 4.1- no discussion about York Region's work	The discussion is based on the tables in Appendix 4, which does include York. York is included in the statistics in section 4.1, there was just no particular point that needed to be made with respect to York's study	None.	Page 35
37.		Section 5.3.1 – there may be areas where all woodlands should be considered significant. The bench mark for significance should be based on the existing regional or watershed conditions not some pristine forest region that exists elsewhere or that existed pre-settlement. Report	We agree, and think this is what the paragraph is saying – it reports that some stakeholders feel that in urban areas very small patches should be significant. This was balanced by other stakeholders who urged us not to loose sight of the meaning of significance. The discussion under local	None.	Page 42

Comment Number	Stakeholder Agency	Comment Received	Response	Relevant Changes	Draft Report Page Number
		should remind reader of this	thresholds recognizes the possible significance of smaller woodlands in urban areas.		
38.		What are the implications if Brampton and Mississauga do not set local thresholds at the local scale for forest cover in Peel?	ROP directs local municipalities to develop OP policies to protect the Greenlands System and will be required to conform to the ROP policies.	None.	---
39.		Section 5.3.3 Age and Late Successional – application of threshold is unclear – average age of all trees? What if instead of an inclusion of 0.5 ha you have very old trees scattered throughout the forest?	Good point. I am not sure we can provide solutions to every contingency that will arise in the application of the criterion; however, we will try to give guidance on this one. We want to discuss it internally, but the initial feeling is that the purpose of this criterion is to protect old woodlands not old trees, thus it will have to be some measure of the age of the canopy dominants, not scattered trees.	We will need to think this through further and will try to provide guidance on application and the intent of the criterion.	Page 46
40.		Section 5.3.7 Proximity – This is very difficult. Not sure if agree that smaller significant woodlands should be excluded “as they are not likely to provide the ecological characteristics that would benefit smaller woodlands that are nearby”. Some species (in the absence of one large forest) will treat several smaller forests as if they are one patch – pileated woodpecker for example)	Not sure how much smaller we can go (i.e. less than 0.5 ha) We agree this is a difficult question as there are infinite combinations of different sizes and distributions of forest patches. Our recommendation is based on our ecological opinion formed from the evidence that is available and to recognize that it cannot capture every situation.	None.	
41.		Proximity – are significant valleylands considered a “significant feature” for this criterion?	Yes – significant features identified in the ROP, and local OPs.	None.	
42.		A2 Colonial Nesting Birds – the CAs should also be consulted	OK	Report text will be edited.	
43.		A3 Waterfowl Nesting Habitat – it is unclear how to apply the threshold under sub-point (b). Would 10 mallards alone meet the test? Or do you need some of “A” list species too?	Yes, 10 nesting Mallards would be enough.	We will make the text more clear.	
44.		A4i Migratory Land Birds – should (c) read, “within 500 m of a river valley...?” The second bullet should just be zones (b) and (c) as (a) is already covered. Is 10 ha appropriate? How many 10 ha sites are there? Or how many 5 ha sites on the lakeshore?	(c) was reworded slightly. The second bullet point appears correct. Not sure how to answer the 3rd last question. We ask that an alternative threshold or threshold approach be suggested. Criterion A4i was reviewed and revised as required. In total, there is 40.5 ha of 5 ha (or greater) successional communities located immediately on Lake Ontario and 166.8 ha of 10 ha (or greater) successional communities within 2 km of Lake Ontario.	(c) was reworded slightly.	
45.		A4iv Migratory Waterfowl Stopover and/or Staging – it should be clarified as to indicate they mean 100 individuals not 100 species. As notes under general comments the TRCA’s species list should be used to add	There is not 100 species of waterfowl in Ontario. Furthermore, specific reference was made to the list. We believe the species listed are comprehensive and appropriate.	The text will be made clearer with respect to the comment regarding 100 individuals.	

Comment Number	Stakeholder Agency	Comment Received	Response	Relevant Changes	Draft Report Page Number
46.		other species that are of low abundance in our watersheds A4vi – the threshold should be refined to clarify whether it is individual habitat patches, or reaches of shoreline. The concentration thresholds given seem quite high given that most of these areas are quite small	Fair comments. After some consideration, we recommend that annual congregations of shorebirds should be based on (a) 100 m reach of shoreline (centered at any location), or (b) habitat patches 0.2 ha in size (centered at any location). This is roughly equivalent to a circle with a 25 m radius or square with 45 m sides. As noted in the draft study report, the thresholds could be circulated to local naturalist clubs, the Ontario Field Ornithologists and possibly Toronto Ornithological Club for review. However, this is beyond the scope of this exercise. It is also worth noting that one additional correction was made to the table. An older version of the table text had been incorrectly inserted. Consistent with the text in the body of the report, thresholds are 75 individuals, regardless of location.	The details on how annual aggregations should be defined will be included in the table and text. The text in the table was also corrected to reflect the fact the threshold should have read 75 individuals regardless of location.	
47.		A5 Raptor Wintering Areas – “Open fields” should likely be defined (ELC communities are used elsewhere in the document). TRCA staff would like the opportunity to review TRCA’s lists to confirm that all relevant species have been listed.	Open fields <i>generally</i> correspond with cultural meadows or inactive agricultural lands. TRCA staff is welcome to comment on the species lists. They are all available in the draft study report.	Table and report body text for A5 was edited to include response to question. Additional edits were also made to this criterion in response to other comments received.	
48.		A7 Bat Maternal Roosts and Hibernacula – Note: with the recent documentation of “white nose” that is decimating bat populations in the NE United States, there may be a need to be even more conservative.	Agreed.	Reference to this new threat will be made in the text. In addition, we will put forward a recommendation requiring that MNR staff be contacted to see if more restrictive thresholds should be implemented. Any new recommendations MNR puts forward should supersede those in the Significant Wildlife Habitat Technical Guide.	
49.		A9 Wild Turkey – staff recognize that reintroduction efforts have been very successful. However, given the fact that habitat loss and hunting resulting in a previous extirpation and many millions of public dollars were spent to recover the species, it might be prudent to protect the species and the investment.	We are in agreement with MNR staff and do not feel that this species is of conservation concern any longer and as such does not require special protection. If this species shows future declines, it could be easily added once again.	None.	
50.		A10 Turkey Vulture – The table should note (as it does in the text) that this would potentially be covered by B1 and B6.	OK.	Table text will be edited accordingly.	

Comment Number	Stakeholder Agency	Comment Received	Response	Relevant Changes	Draft Report Page Number
51.		B7 Seeps and Springs – the results of the Source Water Protection work may be an additional source of information on these.	It will be 5 years until modeling for Source Water is completed. We may be able to use that information at a future date – perhaps during the next OP.	None.	
52.		B8i and B8ii – the text of the report (page 131) indicates that the thresholds were based on the ORM guidelines and that the authors felt that “given the low level of forest cover in the remainder of Peel Region it did not seem appropriate to lower the recommended thresholds for the Region of Peel simply to accommodate this reality. By doing so it would have unnecessarily lowered the threshold for the Town of Caledon”. This is very subjective, and not really based in science. As we know breeding habitat for amphibians is extremely limited within the developed portions of the watershed. By setting the thresholds so high you would likely only capture ORM habitats and the rare populations further south would go unrecognized. The same approach is being proposed for non-forest amphibian habitat and staff has similar concerns.	<p>There is some legitimacy to this comment. However, upon consideration, it was felt that (a) the thresholds set for the Oak Ridges Moraine, while potentially a little high for areas off the moraine, were not entirely unreasonable, and (b) recommending lower standards for all of Peel would have significantly increased the sites qualifying in the Town of Caledon. Attaining balance across the Region was the goal.</p> <p>It is also important to note the following:</p> <ul style="list-style-type: none"> • It is assumed that the thresholds set for the ORM are fair and appropriate. If this is true then perhaps they might be high for Peel as a whole. If they are low on the ORM, then perhaps they are appropriate for Peel. • The appropriateness of the thresholds was specifically discussed with Scott Sampson of CVC. • The text in the body of the report does specifically try and address this potential issue by stating that the City of Brampton and Mississauga could consider adopting lower thresholds. 	None, at least at this time. We welcome further discussion on the matter.	
53.		B10 Habitat for Area Sensitive Forest Interior Breeding Birds – area sensitivity and forest interior are not always synonymous. I it is recommended that both aspects be treated somewhat separately. We recommend looking at the TRCA’s species of conservation concern list for those species that scored high on area sensitivity. Species like ruffed grouse and perhaps woodcock among others should likely be added to the list.	<p>We agree that area sensitivity and forest interior are not synonymous. It is hoped that this was not suggested or implied. However, there are some species that are both. The reason that this criterion was defined the way it was because it was taken directly from the Significant Wildlife Habitat Technical Guide. We purposely tried to be as consistent as possible.</p> <p>Lower thresholds were not recommended for areas off of the Oak Ridges Moraine. We recommend the reader review the text prepared in the body of the report for additional discussion. Neither Hounsell (1989) or Freemark and Collins (1992) list Ruffed Grouse or American Woodcock as strictly forest interior. Neither species is acknowledged as area sensitive by the SWHTG (OMNR 2000).</p>	None, at least at this time. We welcome further discussion on the matter.	
54.		B11 Habitat for Open Country... - ORM thresholds may be too high and not appropriate for all of Peel Region.	The thresholds were prepared after giving considerable thought to the matter. Nevertheless, they are slightly different than what was put forward for the Oak Ridges Moraine (it is a slightly different criterion). We welcome	Three bird species were added to Group B: Horned Lark, Sedge Wren and Willow Flycatcher.	

Comment Number	Stakeholder Agency	Comment Received	Response	Relevant Changes	Draft Report Page Number
			further discussion / scrutiny, especially since this is the first time these particular thresholds have been reviewed.	The second threshold for the criterion now reads “at least three area-sensitive species from Group A and <u>four</u> or more species from Group B.” We welcome further discussion on the matter.	
55.		B12 Habitat for Wetland... - Similar to comments on B11, thresholds may be too high. The thresholds need clarification. Do you have to have 5 nesting pairs of one species or can you have 1 pair of each? Also the species in group B are also listed in group A. Clarification is required	There is 2635 ha of wetland cover in Caledon and 2587 ha in the rest of Peel Region. These amounts are roughly equivalent. In fact, the overall relative percentage of wetland cover was higher in the Region of Peel (4.16%) than the Town of Caledon (3.41%). Therefore, it seemed reasonable to apply the ORM thresholds to both the Town of Caledon and Region of Peel. You can have any combination of species totaling 5 nesting pairs for Group A. Yes, the species in Group B are also listed in Group A. However, the thresholds are different.	The text has been edited to eliminate the confusion.	
56.	Savanta on behalf of North-West Brampton Landowners Group and Solmar Development Corporation	NW Brampton Landowners Group Reserve rights to comment further – note that work is still incomplete	1st draft of report – final draft to be released for comments early September.	None.	
57.		Solmar Development Corporation – some uncertainty around the woodland patch size that will be used as one criterion and trigger the application of the definition of “significant woodlands”. The large block of Solmar’s holdings immediately adjacent to the settlement area of Bolton appears to be within the area referred to in the study report as the <i>Rural System</i> . In Option 1 the minimum patch size that would be applied to these Bolton lands would be 16 ha; in Option 2 that patch size would be 4 ha. One of the patches Solmar has studied in detail, is noted on Figure 4 to be a woodland > 0.5 ha. That patch is not woodland, but rather a thicket swamp, dominated by invasive, non-invasive native European Buckthorn. Although mapping approaches have improved for these small units, Figure 4 and the text would still merit qualifying comments regarding the benefits of detailed site specific work to verify significance.	Point taken. There are limitations to the mapping and there may well be patches that are not in fact woodland, and conversely, some woodlands, which may not be captured in the mapping. We are of the opinion that it is the wording of subsequent policy that will matter and that mapping of woodlands or significant woodlands will always be an approximation.	We will add a caution in the text where Figure 4 is discussed and identify the need for site specific confirmation in the policies. We will also work out an appropriate caveat to put on Figure 6.	

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58.		Brampton being within the “urbanized areas”, and such, will be subject to lower significant woodlands thresholds (i.e. 4 ha)	ROP directs local municipalities to develop OP policies to protect the Greenlands System and will be required to conform to the ROP policies. At a Regional scale, size may be differentiated by Urban System and Rural System. At the local level, criteria and thresholds for Brampton may differ.	None.	
59.		More clarity and precision around the definition of “woodland” and the exclusion of most plantations and very young successional communities is recommended. Recommend adopt ELC approach to woodland definition.	Additional discussion on woodlands and plantations will be included in the next draft of the report. The intent is to follow the ORM practices with respect to plantations, with the possible exception that any plantation that can be demonstrated to have been established and maintained for economic purpose with the intent to harvest should be excluded – this will be developed in the implementation (policy) study. The definition is being refined to better reflect the definition of woodland as identified through the keys in the ELC manual.	We will clarify the definition of woodlands as discussed in response #90 and 92.	
60.		Plantations contiguous with natural forests may be included within the significant woodland designation, where they are relatively older (i.e. > 40 years) and where they possess significant natural regeneration in the understory.	We agree, but also think some younger plantations could be included. The consultant team is of the opinion that a key factor is whether the plantation was planted with the intent of harvesting for commercial purposes or whether it was part of a re-forestation program. If the latter, then it should not be excluded from consideration for significance.	Ensure text is consistent with ORM TP approach.	
61.		Re: 2 ha on South Slope – this approach seems to designate significance “in response to potential future development pressures”. This seems to differ markedly with the interest in letting science drive this process.	The suggestion of a possible 2 ha limit in the future was in recognition of possible future use and the reality that if it is urbanized, the same recommendations made for south of Mayfield Road should apply (i.e., the woodland would be highly fragmented). Thus it is based on the science that would apply should this future urbanization occur. Note that it is only a suggestion, not a recommendation per se.	The consultant team will consider whether this observation in the 2 nd last paragraph of 5.3.1 is needed as it is predicated on a possible future scenario.	
62.		The report further notes it is not addressing the local context in the Cities of Brampton and Mississauga and no recommendations as to size thresholds are provided. However, a size threshold of 2 ha or less may also be relevant in these urban areas. These comments do not appear to align with the objectivity proposed by the approach.	The consultant team does not see the inconsistency. In addition to the ecological and science-based information used, the project included extensive consultation and the need to consider social based concerns in the urban systems was noted by a number of participants. Our noting of this is in recognition of the views of participants in the consultation process. This was not a formal recommendation as the Cities of Brampton and Mississauga were not included in the study at the local scale.	None.	
63.		Essentially all woodlands > 0.5 ha in Peel could become significant woodlands in Peel and in Caledon. This means that there will be no measurable opportunity for the removal, replacement and/or adjustment of these features on the landscape. This effect may be more	The observation may overstate the implications of the recommended criteria, however the consultant team acknowledges that a large proportion of the remaining woodland may be captured. However the team disagrees with the observation that an “overwhelming” amount of	None.	

Comment Number	Stakeholder Agency	Comment Received	Response	Relevant Changes	Draft Report Page Number
		significant in southern areas of Caledon and the “urbanized and urbanizing area of Brampton” (i.e. the Regional approach will be encourage in both Brampton and Mississauga, with lower woodland size thresholds	forest is captured (pg 13 of Savanta comments). In the urban system, even capturing all woodlands would still only represent about 7% of the land base – far short of the 30% suggested by Environment Canada. Although the policy that will implement protection has not been addressed, it is expected that it will limit the removal, replacement or “adjustment” of woodlands – that is the purpose of such policy. The lower thresholds in the urban system, where existing cover is lowest, is consistent with the very low woodland cover there – this is a basic approach to setting thresholds advocated in the NHRM as well as elsewhere.		
64.		Based on our work, we have observed that woodland patch size and configuration become less important when landscape forest cover exceeds 30%-40%. In areas of less than 30%-40% cover (e.g. 15%-30%) a reasonable threshold would be set in a range of 16 ha to 20 ha. The 16 ha thresholds size for woodland significance seems reasonable in rural areas with relatively higher forest cover. The 4 ha threshold for urban areas (i.e. South Slope, Peel Plan) is also reasonably well accepted in the literature and practice. Where we disagree with the proposed guidelines is where discussion extends into woodland significance for patches less than 4 ha in size.	With respect to size alone, we would agree that 4 ha may be a reasonable minimum based on ecological considerations at a Regional level. However, as noted above and discussed in the report, there are other considerations, one being the higher social value placed on smaller woodlands in urban systems the local level. Comments from stakeholders included suggestions that in view of the low forest cover in the urban systems, all remaining woodlands are significant. The discussion of local significance was included in recognition of comments from participants in the consultation program	The consultant team will ensure that the discussion on possible local thresholds is a response to comments provided to us and do not constitute formal recommendations.	
65.		Geographic separation between the higher and lower forest cover areas might be best defined as “one or north of the Niagara Escarpment and Oak Ridges Moraine Planning Areas”, as opposed to the reference only to the Niagara Escarpment.	We see the point and agree this makes sense. The ORM lands were excluded as there are criteria already set in the ORMCP, however we will carefully look at this section and determine the most appropriate wording that reflects the Savanta suggestion and respects the ORMCP.	Review wording of Option 2 to see if lands on the ORM should be included with those on and north of the NE.	
66.		Re: Old Growth and Late Successional Woodlands – Comments regarding inclusions of older forest types within woodland patches needs merit further consideration. The criterion should be modified as, “Woodland, or inclusions in woodlands, that are greater than 0.5 ha in size and older than 90 years should be considered significant. Inclusions won’t automatically result in the designation of the larger patch as significant”.	See response to comment #92	None.	
67.		Re: Linkage Function of Woodlands – agree that the late successional characteristic is significant and merits special consideration with the potential to designate	The consultant team thinks we fundamentally agree on most of the intent here, but disagree on the means to implement. First, the Savanta comment does not provide any reason why	None.	

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		<p>patches as small as 0.5 ha. All other criteria (including criterion 3 and 4) should refer to 4 ha as the threshold. Beyond comments around patch size, the notion that this designation will be determined through a natural heritage study approved the Region or Town is potentially problematic. This causes this designation to be determined at a landscape level. Our experience has shown that while the landscape perspective provides a helpful larger view of broad important linkages, those linkages are best refined at a more local scale, with the benefit of the compilation and assessment of technical field data. As well, the study report refers to the reliance upon the CVC and TRCA Natural Heritage System Studies as the basis for subsequent review and decisions regarding linkage functions in terms of woodland significance. The TRCA TNHSS is completed and the CVC's system is not. From this perspective, the inclusion of this criterion is premature, until such time as both systems are complete and the potential implications are understood. It is recommended that this criterion be not deleted in its entirety as premature, that it be qualified in a manner to reflect the retention of some flexibility around its application. Alternative language might be: "It is recommended that any woodland > 4 ha performing an important linkage function, defined through a natural heritage study be subject to further refinement at local scale of investigation. The linkage function may also be applied to woodlands < 4 ha that meet criterion 2".</p>	<p>all other criteria should use a 4 ha threshold. The consultants have good reasons for not limiting the size of woodlands that can be significant for some criteria, e.g., woodland smaller than 4 ha can provide linkage, support significant species or benefit watercourses in a significant way – the team is unaware of rationale to limit these to 4 ha.</p> <p>With respect to implementation, there were ongoing discussions on the best way to identify linkages and the recommendation to have them identified through an approved study provides the opportunity for the Region to ensure that such studies had adequate peer review and stakeholder consultation, thus giving stakeholders opportunity to provide input to the identification of linkages. The consultants disagree with the suggestion that linkages be identified at the local scale, in fact we generally feel the opposite; that linkages have to be determined in consideration of landscape level function. This does not preclude refinement of boundaries at the local scale. Although CVC's system is not complete it is well advanced and was seen to be worth of use in implementation.</p>		
68.		<p>Re: Proximity to other Significant Features – This 100 m criterion may be more problematic than anticipated. Experience suggests that the inclusion of a 100 m proximity rule for all wetlands could result in a matrix of very small wetlands (i.e. as small as < 0.5 ha) and small woodlands (i.e. 0.5 ha). This matrix could lead to significant complications with the achievement of efficient community design outside of the Niagara Escarpment and the Oak Ridges Moraine. The implications of this and the inclusion of non-provincially significant ANSIs, merits some additional consideration and discussion. We would like to more fully understand the implications of this criterion from a spatial perspective.</p>	<p>The consultants agree that there are instances where balance has to be struck to achieve good planning. This does not diminish the significance of the woodlands that would qualify using this criterion, but simply suggests there are other factors to consider in implementation. For this reason, we suggest that this concern be addressed through policy development. It is noted that the Savanta comment does not contain any ecological reason for the exclusion of these smaller woodlands as it is a planning concern.</p>	Probably none, although see proposed changes for comment #18	

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69.		Re: Surface Water Quality and Quantity – There is some redundancy between criterion 4 and 5. It seems that the wetland reference could be eliminated as it is addressed in criterion 4. The ability to apply judgment is important to build into this criterion. Specifically, it would be helpful to exclude human-created features and minor features that do not contribute in a significant manner to woodland functions.	The consultants recognize there is some overlap between criteria 4 and 5 and this is unavoidable. The overlap does not result in any additional woodlands being captured. The consultants note that human-made features can provide significant functions (old plantations, restorations, etc.) and should not be automatically excluded.	See proposed changes for comment #19	
70.		Re: Woodlands Significant Species and Communities – We support the exclusion of a discussion around regionally rare species, and agree that there is not a sufficiently rigorous database to justify the inclusion of “regionally significant” species of flora, fauna or communities that would legitimately influence the designation of woodland significance.	None required	None.	
71.		Re: SWH – agree with the exemption of “managed lands” from this designation and are cognizant of the data limitations that exist trying to set thresholds for criteria where that assignment seems measurable and effective.	OK	None.	
72.		A3 Waterfowl Nesting Habitat – Some additional clarity is requested regarding how these areas will be determined (i.e. automatic inclusion of 120 m zone around a breeding pond regardless of habitat conditions? Irregular and extended adjacent habitat designations where adjacent upland habitats are irregular and/or asymmetrical.	The text states that waterfowl nesting areas generally correspond with upland habitats adjacent to wetlands and that these nesting areas can extend 120 m away. There is an expectation that all suitable nesting habitat within this band (around wetland types meeting the minimum size thresholds) would be searched for evidence of nesting.	None.	
73.		A4 Migratory Landbird Stopover Areas – It would be interesting to understand how this criterion might affect the province’s interest in accommodating intensification as a key component of Places to Grow. Our interpretation is that this criterion would apply to lands north to about the QEW from the lake.	To be addressed through policy discussion paper.	None.	
74.		A5 Raptor Wintering Areas – This criterion introduces the notion of wintering raptor habitat, a factor not considered in the ORMCP. The result could be the conservation of agricultural and successional fields with no special ecological functions in the spring, summer and fall, but with some congregational importance during winter months. It would be helpful to better understand the implications of this criterion to more fully understand implications. Please provide further insights into how these areas will be identified and defined.	The fact that certain habitat features are used by wildlife groups only during specific times of the year is not unique. Ambystomid salamanders visit breeding ponds only for a few short weeks each spring. Some migrating birds pass through in spring and fall only. Raptors are drawn to specific areas during winter due to the resources they provide. The Fisherville area is an example where raptors gather every winter. Bald Eagles also do this regularly along certain parts the Grand River.	As described in the response, additional details will be provided in the text.	

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			<p>To identify which areas regularly support wintering raptors, multi-year, site-specific information will need to be gathered. If no background sources are available, field surveys may be required. Information gathered must be multi-year in nature to ensure raptor presence is not simply a response to shifting prey populations but a more permanent expression of the quality of the site. Therefore, confirmed sites should be occupied at least 60% of winters (almost 2 out of every 3 years).</p> <p>To identify which open fields require assessment, the SWHTG should be referenced. Contact with local naturalists and MNR staff would also be helpful. For example, some open fields (e.g. those in early succession, are adjacent to woods, have available perches, are sheltered from the wind, and are least disturbed) are preferred over others. Open fields generally correspond with cultural meadows or inactive agricultural lands.</p> <p>Existing agricultural activities will not be impacted.</p>		
75.		B5 Highly Diverse Areas – this criterion should concentrate on non-cultural communities to optimize native specie biodiversity interests.	<p>After further consideration we have decided to retain all “cultural” communities in the analysis for this criterion, with the exception of cultural meadows. In the context of southern Ontario there are virtually no communities that are pristine natural features, and all but intensively managed features are undergoing succession toward a future forested form. Recent research highlights the value of these successional communities as part of a landscape mosaic in Peel, particularly birds.</p> <p>We have no issues with excluding features that are demonstrably manicured but do not otherwise support eliminating all cultural communities from consideration. This would exclude a majority of successional communities and their associated diversity.</p>	None.	
76.		B7 Seeps and Springs – It would also be helpful to provide quantitative thresholds if possible that can help decide the magnitude of these features that would trigger delineation. We also note the need for consideration of the “hydrologic dynamics within the catchment area. Please clarify that these catchment areas will not be included within seeps and springs SWH designation.	<p>The bulleted points are indicators used to identify the presence of seeps or springs rather than a means of defining significance to wildlife. Quantitative thresholds related to wildlife have not been established to date to our knowledge. The importance of seeps and springs, and their areal extent as in regard to Significant Wildlife Habitat, relates to their site-specific significance to plants or animals i.e. how are</p>	The report has been revised to require indicators in conjunction with evidence collected through background or current site-specific studies that the seep or spring provides habitat for or otherwise supports other SWH criteria (as identified in this study).	

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			<p>wildlife species and plant communities affected by their presence. We have revised the criteria so that if a seep or spring provides habitat for or otherwise supports or triggers other SWH criteria, that it be co-designated as SWH. Examples of SWH criteria potentially supported by seeps and springs include: Deer Wintering Areas, Wild Turkey Winter Range, Rare Vegetation Communities, Highly Diverse Areas, Amphibian Breeding Habitat (indirectly), and Habitat for Species of Conservation Concern. The last criterion would also include fish species.</p> <p>Catchment areas will not be included under SWH designation, but need to be considered in order to ensure the functional hydrologic connections are maintained.</p>		
77.		<p>B8ii Amphibian Breeding Habitat (non forested sites) – some additional clarity is requested regarding the likely outcomes of this criterion (e.g. typical amounts of upland habitat that might be required to conserve a population of 20 pairs of breeding amphibians). Confirmation would be helpful regarding whether this additional upland habitat will be included within the SHW designation. It would also be helpful to understand how the extend of this upland habitat will be determined where adjacent upland habitat is a mix of agricultural use and cultural or natural vegetation communities.</p>	<p>It is probably not possible to provide a generalized estimate for a minimum area requirement of upland habitat. Calhoun & Klemens (2002) recommend that less than 25% of the critical terrestrial habitat (i.e. area within 228.6 m of the breeding pool) be developed. If the critical terrestrial habitat zone is equivalent to 16.41 ha of (assuming the breeding pool is a point) suitable upland forest, a minimum of 12.31 ha would be needed to protect the individuals utilizing the breeding pools. However, since breeding pools may not have a circular amount of suitable upland forest of the required size around them, we would recommend the entire 16.41 ha would be required. Where feasible, restoration of non-forested environments within the critical terrestrial habitat zone should be a priority. In addition, no roads within the critical terrestrial habitat zone are recommended.</p> <p>Yes, it is assumed that the adjacent surrounding habitat (i.e. critical terrestrial habitat zone) would be included as part of the SWH designation for the breeding pool.</p> <p>It is the amount of critical terrestrial habitat that is protected that is important, especially if other non-forested land uses (e.g. active agricultural lands) are present in this zone. The extent of upland forested habitat that is protected would have to be determined on a site-by-site basis and take into account species-specific habitat requirements. However, we would assume a certain amount of flexibility would be shown on this matter if some commitment could be made to restore</p>	None.	

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			abandoned agricultural lands.		
78.		B10 Habitat for Area-Sensitive Forest Interior Breeding Bird Species – we suggest that the reference of the “documented presence of 3 or more pairs of listed species...” should be clarified by adding, “confirmed breeding”. Plantations even at a more advanced age need to be considered carefully in terms of functional importance prior to the automatic inclusion as SWH.	<p>We disagree with the suggestion. What is most important is that these species have determined the habitat to be suitable. Besides, it is our experience that required survey protocols (typically two visits a week a part during the breeding season) may not be enough to determine if breeding was successful.</p> <p>However, it may be helpful to establish residency status. It is not our desire to include one-off observations of birds (i.e. a bird at the edge of its range, in marginal habitat, staying for a few days). Habitats that support regularly occurring species should be the focus.</p> <p>The intention was to recognize the value of older plantations, including those no longer actively managed. Ultimately, if area-sensitive forest breeding birds are present in these plantations, it indicates that they are providing valuable habitat for this species group.</p>	None.	
79.		B11 Habitat for Open Country... - Defining the open country habitats as lands not actively farmed for 5 or more years may present implications in terms of current farm practices. This point would merit clarification that designations will not occur on productive agricultural lands even where particular fields are left fallow for periods of time.	<p>To clarify, the 5 year threshold came from the ORMCP TP#2 guidelines.</p> <p>It is our understanding that under the PPS the SWH designation cannot place restrictions on normal agricultural activities, as they are not defined as ‘development’. If the Region or Town of Caledon recognizes a particular site to be of particular significance, it could always encourage stewardship and perhaps (as suggested by some farming organizations) subsidize farmers to maintain lands out of production for conservation purposes.</p> <p>When a land use change is proposed then the Region can intervene through planning controls. However it also means that even then they will also need to figure out how to manage the lands as otherwise the land will eventually become forested.</p>	None.	
80.		C Habitat for Species of Conservation Concern – these criteria conflict with the new <i>Endangered Species Act</i> , 2007, in that flexibility tools and agreement opportunities addressed in the Act are not provided for in this criterion. Some additional discussion is required to optimize outcomes around species at risk conservation and to more	We do not believe these criteria conflict with the new provincial <i>Endangered Species Act</i> . “The new act prohibits damage or destruction of habitat for species at risk (those listed as endangered or threatened on the Species at Risk in Ontario (SARO) List)” whereas the various criteria listed in Section C are aimed at wildlife species of lesser conservation	Unsure. The text will be reviewed.	

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		<p>clearly link this criteria group with this new legislation. We also encourage the Peel/Caledon work to more overtly embrace stewardship opportunities and encouragements more generally, versus the more restrictive criteria-based approach presented. It would be useful to discuss exemptions related to butternut (disease affected) and species that not being affected principally by habitat loss, but instead are being more affected by hybridization (e.g. golden-winged warbler).</p>	<p>status.</p> <p>Moreover, it is worth reminding the reader that according to Section 2.1.4 of the Provincial Policy Statement, even if the habitats of certain species were designated to be Significant Wildlife Habitat, the PPS does not necessarily restrict development outright. It simply has to demonstrate that there will be no negative impacts on those natural features or their ecological functions.</p> <p>Despite the fact that some species are currently being negatively affected by factors other than habitat loss, providing exemptions for those species could further undermine their conservation status. Habitat loss would be added as another negative factor. With respect to the Golden-winged Warbler, the Atlas of the Breeding Birds of Ontario lists “loss of breeding and wintering habitat, nest parasitism by Brown-headed Cowbird, and hybridization with the Blue-winged Warbler” as the primary reasons for declines.</p>		
81.		<p>C7 Species that are Regionally Rare - should this criterion persist, it should be accompanied by the posting of current status lists (e.g. on the Regional website) along with an opportunity for the ongoing review, update and revisions as appropriate.</p>	<p>This comment refers to C6 - Species that are rare within The Regional Municipality of Peel/Town of Caledon, even though they may not be provincially rare, <u>not</u> C7 (as indicated).</p> <p>Because this criterion specifically focuses on the status of species in the Region of Peel / Town of Caledon, we believe that this criterion is especially relevant and should not be abandoned. Having such a criterion directly enables the Town and Region to identify and protect those species within its jurisdiction that are rare and therefore help maintain local/regional biodiversity.</p> <p>However, we do acknowledge the difficulties in developing and maintaining these lists. As such, some commitment from the Region and/or Town will be necessary if local conservation issues are going to effectively identified and addressed. Until these new lists are developed, we support the qualified use of any existing lists. That is, unless it can be clearly shown why a species should not be on the list the existing list should rule. We would rather support the precautionary principle than have no list at all.</p>	<p>Unsure. The text will be reviewed.</p>	

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			How often these lists would need to be reviewed and updated would need to be determined.		
82.		D Animal Movement Corridors – We request further explanation of the role and designation of tertiary features. Based upon this wide range of functional importance it would seem reasonable to define this significant wildlife habitat designation based upon primary and secondary corridors. The degree to which these features would function in a post-urbanization context requires further consideration. We don't believe these would automatically deserve designation as SWH.	Typically, animal movement corridors, particularly at a landscape scale, are identified as part of natural heritage systems and only after other significant natural features (e.g., Provincially Significant Wetlands, significant woodlands, ANSIs, etc.) have been mapped. Therefore, mapping and specific thresholds for animal movement corridors were not developed as part of this study. However, the principle of identification of such corridors is strongly supported by this study and it is recommended that animal movement corridors be identified and designated at inter-regional, regional and local scales (primary, secondary and tertiary corridors respectively). With respect to tertiary corridors we agree that these may have a limited function in an urbanized landscape depending on their condition, form and context. However this should not be a deterrent to identifying such corridors since they may represent the last remaining opportunities in the local landscape for movement of wildlife such as small mammals and herpetofauna. Critical examples include open space connections between amphibian breeding pools/ponds and forested upland areas where these species forage and over-winter. However, as stated in the Draft Report (Sept 22, 2008, Draft for Public Comment), Tertiary Linkages “will likely need to be defined at the secondary plan or site development application stage using site-specific information. These corridors are important at the local scale, but may be identified more flexibly than Primary or Secondary corridors in relation to proposed developments since they are not typically associated with relatively fixed and large-scale natural features. For example, in some cases it may be of more ecological value to create a linkage across open space that directly connects two protected natural areas with native trees and shrubs rather than preserve an existing hedgerow dominated by invasive species that provides a less direct link”.	None.	
83.	City of Brampton Staff	Section 1.3– Scope of Study First paragraph - “The Significant Woodlands and Significant Wildlife Habitat Study, along with the Region’s PROPR Natural Heritage Policy Review and the	Agreed	3 rd paragraph deleted	Page 4

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		Town of Caledon’s PPC exercise will develop criteria, thresholds and policy for Regionally and Town-specific significant woodlands...” The study will also include the development (or revision) of the current woodlands definition. Third paragraph – recommend delete because is a repeat of the second paragraph.			
84.		Section 1.4.1 – Provincial Policy Initiatives Re: Oak Ridges Moraine Conservation Plan section, third paragraph - This report-Appendix 2 has not included the full definition regarding the qualifications where the woodland is located within the ORMCP area and crown size, i.e. “And which have a minimum average width of 40 metres or more measured to crown edges. And which are: 4 ha or large in size located in the Countryside or Settlement Areas of the ORMCP. Etc.” I believe that this is an important distinction since as you move away from the sensitive areas of the ORM the definition of area gets broader. Further, a more detailed explanation of what the ORMCP means in terms of cultural savannahs is necessary.	Good point – we will add the piece on the minimum 40 m width, however, the section on minimum sizes is not relevant off the moraine as 1) we developed other size criteria, and 2, there are no ORM land use designations off of the ORM. The definition of woodlands vis a vis savannahs will be refined to better reflect ELC usage. Some site-specific information will be necessary for addressing “cultural” savannah, and this will be addressed in policy	Refine definition to recognize minimum 40 m width from crown edges. Refine definition of woodlands to reflect ELC keys (not the ELC definitions which may be in error). This will result in the minimum canopy cover being 25%. We will recognize need for flexibility with cultural savannahs and recommend this be addressed in policy	Page 8
85.		Section 2.1.2 Data and Mapping Sixth paragraph - Further, Mark Head has noted that the Region’s original & ROPA 13 woodlands only include forest and woodland cover – how do these data bases match then? Last paragraph – clarification should be provided as to whether cultural savannahs will be included as woodlands.	The woodlands base layer for PROPR is consistent with the woodlands base layer for ROPA 13. Both base layers map forest and woodland ELC classifications. Neither layer maps savannah. The PROPR woodlands base layer includes additional refinements and is therefore more current than the ROPA 13 base layer. Cultural savannahs will be included as woodlands as this is the direction of the provincial standard (ELC). However, we will recognize the issues that arise from this and recommend a solution be developed in policy	As noted in response to #84	Page 16 & 17
86.		Section 2.3 - 2.3 Key Principles for Criteria Selection Re: Separate Identification of Significance from Protection Policies - While we can agree with this philosophy in principle, this study lacks a detailed review of using the preferred woodland definition, i.e. what it means compared to what the Region previously did, etc.	There was discussion on the selection of woodland definitions with the TAT and the MSWG during consultations and the decision to use the ORM definition was unanimous. The repercussions of using a different definition is more related to implementation (i.e., the repercussions of changes do not provide a technical basis for modifying the definition) and was not covered as part of the technical report. There will be additional discussion of the	The discussion of woodland definition will be expanded to clarify the terminology, especially with regard to the ELC usage of “savannah”, “woodland” and “forest”, as noted in response to #84. It is suggested we also add a note up front to clarify that “woodland” and “forest” are used synonymously in the report, and not in the technical sense as defined in the ELC.	Page 19

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		<p>This is necessary to ensure complete understanding of the implications of this new direction.</p> <p>Re: Base Criteria Selection on Ecology and Conservation Principles - I concur with this statement, which makes understanding a new SW definition even more imperative. Tableland cultural savannahs have not been conserved to date – what does it mean if they are now. We concur that we do not want to critique a feature if it meets a suite a criteria as to why it is significant, which is why the definition is so important.</p> <p>Re: Keep Process of Identification as Simple and Objective as Possible - I believe that this principle is more applicable to SWH than woodlands.</p>	<p>definition provided in the next draft, but there is no intent of doing a detailed analysis of the repercussions of the change from the existing definition.</p> <p>The issue regarding the cultural savannahs will be addressed as noted above.</p> <p>Proposed Core Woodlands mapping will be prepared and compared with the existing Core Woodlands identified on Schedule A to the ROP. Information will be included in the discussion paper as part of the policy process.</p>		
87.		<p>Section 3.1-last paragraph (p.26) – an earlier section of the report stresses that the science of defining significant woodlands must be kept separate from the issue of policies to protect woodlands. However, this type of statement brings the two issues together, and lends support to why it is necessary to ensure that we can implement what we believe we want to protect.</p> <p>Secondly, this section has introduced another element i.e. ‘urban forest’, which could be construed as a different issue. In this regard, it is noted that Peel is undertaking the Urban Forest Study, Draft Terms of Reference April 2, 2008 in partnership with York, Durham and the CAs. The purpose of the Urban Forest Study is to provide the technical guidance for urban forest policy development by recommending a model strategy to maintain and enhance an urban forest within Peel Region. The urban forest is defined as “ the sum of all woody vegetation (trees, shrubs) and associated vegetation (flowers, grasses, ferns) within densely settled urban areas. The urban forest may be dominated by native or exotic plant species.”</p> <p>Having said this, we agree that it is appropriate that the SW & SWH report acknowledge the Urban Forest Study and the relationship of this future work to significant</p>	<p>The PROPR Natural Heritage Discussion Paper will examine options for identifying and protecting significant woodlands and significant wildlife habitat within the ROP. Further discussion on how the science will lend to the policy development will occur at future project MSWG and TAT meetings. The next meeting is scheduled for Sept.8, 2008.</p> <p>The Urban Forest Study, being led by TRCA in partnership with the Region, CVC and the area municipalities aims at better understanding the structure of the urban forests in Peel and the functions they provide, such as benefits to human health and assist with mitigating the affects of climate change. As part of the study process, it is anticipated that Regional and area municipal staff will need to further discuss how the results of the Urban Forest Study will relate to OP significant woodlands policies.</p> <p>It is important to note that for the purpose of the Peel-Caledon Significant Woodlands and Significant Wildlife Habitat Study, “rural” and “urban” woodlands are not being defined differently. Also, PPS does not discriminate urban forest. Rather, an option is provided to evaluate the “significance” of woodlands based on patch size, which differs within the rural and urban systems of Peel due to human activities and land uses.</p>	None	Page 26

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		woodlands and whether or not the urban forest definition compliments and/or contradicts the final woodland definition.			
88.		<p>Re: Woodland Coverage – while this paper is addressing Peel Region, comparing woodland coverage in Caledon versus Brampton-Mississauga does not seem appropriate to address what should be deemed significant, since a rural-urban split has already been acknowledged. It should note further that the cities are not within the ORM (or for that matter the NEC or the Greenbelt, with one areal exception in Brampton), and are expected to grow significantly through the Growth Plan. Discussing and comparing Mississauga and Brampton is appropriate. Reviewing the size distribution of woodlands across Brampton, either ha or % of cover by each size class, various conclusions could be drawn as to what size ‘urban significant woodlands’ should be. As an example, woodlands >30 ha comprise 1400 ha and 58% of woodland cover, whereas woodlands <30 ha comprise 1020 ha and 46%; or woodlands >10 ha comprise 1887 ha of 2400 ha and 77.6% of woodland cover. From a ‘significance’ standpoint, it may have been more important to examine woodlands that do not fall within (are not addressed by) other Core Greenlands such as valley corridors.</p>	<p>The relationship of the municipalities and the ORM and other provincial plans is illustrated in Figure 2. It is a well established principle that existing forest cover be considered in the identification of woodland significance (e.g., see NHRM). Moreover, it is important to note existing forest cover as part of setting the context for the study and describing the study area. We also note that the TOR for the project included the Region and the Town of Caledon as the study sites, thus Mississauga and Brampton woodlands were only addressed from a Regional Context.</p> <p>A designation of significance needs to rely on more than just size and distribution, although this was certainly used. We support the approach of using multiple criteria, as discussed and agreed to by the MSWG and TAT during consultations early in the project.</p> <p>The criteria for significance were designed to stand alone and not just address woodlands not captured by other policies. This is consistent with application of the PPS and NHRM.</p>	None	
89.		<p>Section 5.1 Considerations for the Development of Criteria for Significant Woodlands – the report notes that “The general setting of the Region of Peel and the Town of Caledon with respect to physical features, development patterns and resulting existing forest cover has repercussions for the selection of criteria and thresholds for identifying significant woodlands”.</p> <p>This point also holds true for a woodlands definition. The ORMCP area is many things that large portions of the Region of Peel are not, e.g. a provincially significant contiguous landform feature containing significant groundwater features, within the Greenbelt; not comprised of significant large urban cities (that are expected to grow); the physiographic Peel Plain, etc. The argument for only one woodland definition has not examined whether the ORM and areas beyond equates to</p>	<p>It is preferable that the definition of what constitutes a woodland not be dependant on policy areas. From an ecological perspective, a woodland on the ORM is not necessarily different from a woodland off the ORM (generally they are composed of the same species, perform the same functions and are susceptible to the same threats). The principal difference is in the commitment to protection, which is a policy issue. With the proposed refinements, the definition will now depart somewhat from the ORM definition</p> <p>We note that the definition options were specifically presented to the TAT and MSWG in consultations early in the project and decisions made which reflected the direction provided by the TAT and MSWG.</p> <p>Although there is no formal reference to “savannah” in the</p>	None	Page 39

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		the rural and urban systems; nor examined what has occurred (i.e. opportunities and challenges) using the previous ROP woodlands definition and criteria.	definition, the current ROP woodlands definition is sufficiently broad that it could be interpreted to include savannah. It is only the base layer mapping and hence identification of Core Woodlands on Schedule A that do not include savannah. Through the PROPR Natural Heritage Policy Review, the ROP definition will be reviewed in light of the Study Report recommendations and improvements identified accordingly.		
90.		<p>Section 5.2 Defining Woodlands</p> <p>Woodlands Definition</p> <p>As noted earlier, a better discussion of cultural savannahs is necessary to understand the implications of the ORM definition and should begin with qualifying whether this definition would actually include a CUS community.</p> <p>There needs to be a recognition of the Region’s current definition (and therefore mapping standards) and then a discussion of why a new definition is required.</p> <p>Since we are recognizing an Urban and Rural systems because of the differences, there should be a discussion whether these areas may the ORM and areas beyond. If they do, they one definition isn’t necessarily critical.</p>	<p>A new section will be added that further describes the components of a woodland and the relationship to forests and savannahs.</p> <p>The consultant team will not incorporate a discussion of the implications of a new definition in this technical report for reasons noted in previous responses above (see responses provided for Section 5.1).</p>	The proposed refinements to the definition are provided in response #84. There will now be two definitions for the Region, as the ORM definition must stand on the ORM, but the definition proposed in this report will apply elsewhere.	Page 39
91.		Section 5.3.3.1 Woodlands Patch Size – we note the background on patch sizes. We are reviewing the proposed criteria and threshold for Core Woodlands (Option 2) notably ≥ 4 ha for urban system in the context of the existing and planned land uses in the City.	This work being undertaken by City staff will be considered by Region staff and the consultant team for the PROPR Natural Heritage Policy Discussion Paper and future policy options.	None.	Page 40
92.		<p>Section 5.3.3 – Age and Late Successional Woodlands – it is only the ORM definition that brings forward the 0.5 ha as any type of criteria. While there is a discussion in Section 3.1 regarding the number of forest patches < 0.5 ha within the municipalities, this does not make it a base criteria for examining other aspects of woodlands.</p> <p>Having said this, we would agree with old growth areas of 0.5 ha or greater being considered significant, since they are limited in southern Ontario and particularly in the urban environment. However, while old growth areas</p>	The consultant team believes there is adequate justification for protecting the woodlands around old growth inclusions. Woodlands need to be addressed on an ecosystem basis, not as discrete entities. The opinion of the consultant team is that old growth woodlands confer a level of significance on the surrounding woodland, as well as rely on it for their persistence and health. Their recommendation is to include surrounding forests. This could be modified in policy to allow flexibility, but it would weaken the ability to protect woodlands	None.	Page 49 and 50

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		<p>of 0.5ha may be appropriate to preserve, we disagree that this criteria should confer significance on the entire woodland patch that contains the old growth area. This has not been fully justified. It should be clearly acknowledged that the conditions of the old growth patch and the surrounding vegetation community will need to be examined to confirm what is happening in that location, and with the old growth inclusion.</p> <p>There has been no discussion to date regarding using 0.5 ha as a threshold for anything was in the ORM woodland definition.</p> <p>While old growth areas of 0.5ha may be appropriate to preserve, confer significance on the entire woodland patch has not been justified. The conditions of the old growth patch and the woodland need to be examined to confirm what is happening in that location and with those species.</p>	<p>0.5 ha was the minimum size used to identify a woodland or forest. When it is used in a criterion, it is basically saying “all woodlands”. Contrary to the comment claiming there was no discussion of the 0.5 ha, the use of 0.5 ha was discussed and agreed to at the TAT and MSWG meetings early in the study so that we could proceed based on agreement. 0.5 ha is commonly used to define the minimum patch size for identifying forests and woodlands.</p>		
93.		<p>Section 5.3.6 Linkage – while we agree with the need to determine linkage, we believe that the determination of the significance of woodlands to be considered linkages that are <4ha should be as ‘recognized or approved by the local municipality’ not the Region.</p>	<p>This is an implementation issue. From an ecological perspective, it is important to protect woodlands that serve a linkage function and whether this decision is done by the Region or a local municipality, or both, is something that should be resolved in policy development during the PROPR Natural Heritage Policy Review component of PROPR Which follows the Study Report.</p>	None.	Page 52
94.		<p>Section 5.3.7 Proximity – we don’t disagree with proximity being considered a factor; however, there has been no rationale for the 100m. In particular, the MSWG/TAT felt that something between 20-30 metres may be appropriate. It is also noted that 10-20m is often identified as the distance where two polygons may be considered one feature/unit. Since the proximity criterion is meant to increase available habitat and facilitate dispersal, we would support 30m as a proximity criteria (noting that 30m is also a rationale for buffering, water quality improvement, etc.). However, as noted above, any determination of the significance of woodlands (based on proximity) that are <4ha should be as ‘recognized or approved by the local municipality’ not the Region.</p>	<p>The consultant team agrees that the determination of an appropriate distance to include in the proximity criterion is difficult and the discussion in the draft report notes that distances from 30 to 750 metres have been used in various applications. There is no concrete threshold for this distance and the argument is based on expert opinion using ecological knowledge – there is no absolute right or wrong solution. None of the examples provided in the comment reflect the issues being addressed with the proximity criterion – it is not a buffer, nor is it intended to identify patches that function as a single entity. The TAT/MSWG did not reach a conclusion on this criterion but suggested it should be between 30 and 100 m. Other municipalities have used 50 m, 100m and 750 m in various ways (see Appendix 4). Based on the consultants’ review, as provided in the report, 100m is an appropriate distance for this criterion, and the consultants</p>	None.	Page 55

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		There was no agreement to a 100m. Most of the comments provided indicated that a shorter distance may be more appropriate. There has been no rationale why 0.5 ha is fallback size for other criteria used to define significance, other than it is the minimum woodland size.	have not been provided any ecological arguments to suggest another distance.		
95.		Section 5.3.9 Representation (age) - ORMCP #7 indicates that it is a 1000 trees/ha of any size.	We are aware of this. We are unsure what the comment is requesting.	None.	Page 56
96.		Section 5.3.11 Surface Water Quality and Quantity – we do not disagree with this criteria; however, as noted above, any determination of the significance of woodlands (based on surface water quantity and quality) that are <4ha should be as ‘recognized or approved by the local municipality’ not the Region.	As with comment 93, this is an implementation issue and should be addressed through policy development during the PROPR Natural Heritage Policy Review.	None	Page 57
97.		<p>Significant Wildlife Habitat</p> <p>Section 6.5 Overview of Candidate Criteria</p> <p>It is noted that a great deal of this criteria has implications for adjacent lands, such as that identified for A3 Waterfowl Nesting Habitat in that the study identifies “Note: Waterfowl nesting areas generally correspond with upland habitats adjacent to marsh, swamp & shallow water ELC community classes, and generally extend out as far as 120 from the wetland (> 0.5 ha) or a cluster of 3 or more smaller (< 0.5 ha) wetlands within 150 m of each other.”</p> <p>It is challenging to understand what will trigger the identification of specific wildlife habitat inventories and evaluations, since it is acknowledged that there is little wildlife data available. The City would rely on MNR and the CAs to identify when and what studies are necessary and what type of application will trigger such requirement.</p>	<p>The presence of potentially suitable habitat should trigger when specific wildlife inventories are conducted. Often, this determination is made in the field at the time of project initiation.</p> <p>To help ensure that proponents are appropriately identifying Significant Wildlife Habitat, environmental planning staff could develop and rely on a checklist approach to determine what wildlife inventory work is required. It could work in the following manner. If features/conditions listed on the checklist are present at the site being considered for development, the proponent would be requested to undertake corresponding wildlife surveys. As an example, the Oak Ridges Moraine Conservation Plan Technical Paper #2 – Significant Wildlife Habitat does provide an ELC based approach. Ultimately, this is an implementation matter each jurisdiction needs to address. CA and MNR staff could be called on to assist. In addition, EIS guidelines should specifically list Significant Wildlife Habitat as one of the things requiring assessment. Reference to the Significant Wildlife Habitat Technical Guide should be made to help guide the proponents review. EIS guidelines could also list the Peel – Caledon Significant Woodlands and Significant Wildlife Habitat Study for guidance as to when studies may be required.</p>	None.	
98.		SWH Table 8 - Some habitat areas are obvious, i.e. vernal pool, but how do we determine the extent of the habitat for a nest within a mature woodland but potentially surrounded by others trees areas that may not be	Species-specific knowledge may be required to answer this question. Answers will depend on the ecological habitat requirements and sensitivities of the species in question as well as the specific nature of the development proposal. For	None.	

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		considered significant.	example, it is true that the individual home ranges of some area-sensitive forest bird species may be quite small but for them to exist they may require a large habitat patch to breed successfully. The requirements of other species may be more closely linked to specific vegetation elements rather than size alone. Furthermore, some species are more sensitive to development than others. The range of factors to be considered when defining Significant Wildlife Habitat can be quite broad.		
99.		B5 Highly Diverse Areas – Re: Sample mapping from the Region - When will we see this mapping!	Mapping will be included in the Natural Heritage Policy Review Discussion Paper.	None.	
100.		B7 Seeps and Springs – “20 breeding pairs/egg masses from species listed in Group B (i.e., species that tend to behave more like vernal pool obligate species, at least in Peel Region). There shall be no minimum species requirement of 2” – This is unclear what is being said.	Based on the quote included, we are assuming that the criterion under question is in fact B8 – Amphibian Breeding Habitat. The reference to “There shall be no minimum species requirement of 2” simply means only one species listed needs be present to be designated Significant Wildlife Habitat.	The threshold text has been edited to provide greater clarity in this regard.	
101.		B10 Habitat for Area-sensitive Forest Interior Breeding Bird Species - Must both of these conditions be met – i.e. interior patch >4ha and 3 pairs – or is either threshold sufficient.	The wording means that either threshold is sufficient. If area-sensitive forest interior breeding birds are present in interior habitat patches < 4 ha in size but above the threshold numbers, it indicates that the habitat patch is providing a significant function despite its small size and should also be designated.	The wording will be reviewed.	
102.		B11 Habitat for Open Country and Early Successional Breeding Bird Species - Is this both breeding and foraging? Are there other utilization activities?	Breeding habitat and foraging habitat usually correspond with one another. That is, most species forage in close proximity to their breeding habitat.	None.	
103.		C Habitat for Species of Conservation Concern Criteria - Can list of these species be compiled for Peel?	It would be desirable to have lists for breeding birds and amphibians. This is beyond the scope of the present exercise. The Natural Areas Inventory (NAI) Study being conducted by CVC for all of Peel may eventually provide a comprehensive list of breeding birds and amphibians for Peel.	None.	
104.		C8 Species considered important to the Regional Municipality of Peel / Town of Caledon, based on recommendations from a local Conservation Advisory Committee - What is this group? What relationship would a list that they derive have in comparison to the CAs?	The term “Conservation Advisory Committee” was taken verbatim from the Significant Wildlife Habitat Technical Guide (SWHTG). It our understanding that this generically describes a committee with membership of knowledgeable naturalists familiar with conditions and biota in the jurisdiction. Some ‘Environmental Advisory Committees’ possibly fall into this category although typically their role is to review planning submissions and they may not have the necessary field knowledge, or mandate to develop such specific lists. We would expect that that a Conservation	The text in the report will be reviewed and edited as appropriate to provide additional clarity.	

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			Advisory Committee would be aware of and consult status lists prepared by local CAs, but would have the knowledge base to refine the use of such lists. For example, certain species are less common within the boundaries of Peel Region or the Town of Caledon as compared with the jurisdictional areas of the CAs, and therefore require special consideration with respect to their conservation. Appendix H of the SWHTG provides additional information that should be considered.		
105.		Section 6.5.3 Criterion A3: Waterfowl nesting habitat – Kevin Ritch is “Kevin Rich”	Spelling confirmed.	Spelling corrected.	
106.	Ontario Ministry of Natural Resources (OMNR)	Section 1.1 Study Purpose - The reason that there is a better likelihood of mapping SW is because we tend to know where the woodlands are located. However, some woodlands cannot be deemed to be significant until you apply the criteria at a site-specific level. With regards to SWH, at this time we do not have the majority of the wildlife habitat areas mapped. Therefore it is difficult to assess the significance.	Accepted OMNR changes to this section.	Most of the information to enable mapping of woodlands and identifying those that may be significant is available and it should be possible to map <u>a good portion</u> of their locations. However, there is insufficient information <u>at this time</u> to facilitate mapping of significant wildlife habitat on a Region-wide or Town-wide basis. Significant woodland analyses can be undertaken at a landscape scale and include mapping because of better data availability and the subsequent fuller understanding of woodlands <u>in general</u> at the Regional and Town scales.	Page 3
107.		Section 1.3 Scope of Study, 3 rd paragraph	Accepted OMNR changes to this section.	Policy 3.2.4.3 of the Greenbelt Plan states that KNHFs <u>beyond the Natural Heritage System within the Protected Countryside</u> are to be defined pursuant to, and subject to the policies of, the Provincial Policy Statement.	Page 4
108.		Section 1.4.1 Provincial Planning Initiatives, <i>Oak Ridges Moraine Conservation Plan (ORMCP)</i>	Accepted OMNR changes to this section.	Given that approximately 80% of Caledon falls within the Greenbelt policy area, and that forthcoming Greenbelt guidelines with respect to significant wildlife habitat are expected to be largely consistent with <u>based on the criteria and process by which</u> the ORMCP Technical Paper #2 <u>was based on</u> (J. Boos, OMNR, pers. comm. 2008), this approach makes sense for the Region of Peel and the Town of Caledon (see Section 6.1).	Page 8
109.		Section 1.5 Rare Species Legislation and Rankings, 5 th and 6 th paragraphs	Accepted OMNR changes to this section.	The bill passed third and final reading on May 16, 2007, received Royal Assent on May 17, 2007 (becoming law) and will come <u>came</u> into	Page 13

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				<p>force on June 30, 2008.</p> <p>The new <i>Endangered Species Act</i> is intended to protect species identified in the Species at Risk in Ontario (SARO) list which when it is proclaimed is a regulation under the new Act. The SARO list must correspond with the list of species classified by the Committee on the Status of Species at Risk in Ontario (COSSARO), which is an independent scientific body. The categories used by COSSARO are: Extirpated, Endangered, Threatened or Special Concern Species. In addition, when new information is reported to the Minister by COSSARO, SARO must be amended to accurately reflect the new information. COSSARO categories are identical to those used by COSEWIC (discussed above), although some cases the status assigned to particular species may vary. Habitats that support species designated Special Concern by COSSARO may merit identification are considered as significant wildlife habitat in municipal official plans.</p>	
110.		<p>Figure 2 Physiographic Map - The Greenbelt Boundary is identified on the map as an overlay on top of the ORMCP and NEP areas as well as the Protected Countryside. However, there is no identification of where the Greenbelt Plan applies, which for the most part is just the Protected Countryside. This should be added to the map.</p> <p>There is a part of the Greenbelt Boundary that is located within the City of Brampton that is also identified as being within 2031 Urban Boundary Area. It is recognized that the City is all urban, however, the Greenbelt Plan will still apply to that area identified as Greenbelt Boundary.</p>	The policy implications of the Greenbelt Plan including mapping of designations will be addressed through the Natural Heritage Policy Review and Greenbelt Plan Conformity exercises.	None.	
111.		<p>Section 3.3 Overview of Natural Heritage Features and Designated Areas</p> <p>Re: Honey Locust - Occurrence in Peel is probably neither natural nor related to recovery efforts.</p>	Changes have been made to the report	America's Hart's-tongue Fern has been removed from the list.	Page 32-33

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		<p>Recommend deletion from list. Also recommend deleting Bluets from the list as it has not been seen in some time. Instead could add: Schreber’s Wood Aster, Bushy Cinquefoil, and Evening Primrose.</p> <p>Re: America’s Hart’s-tongue Fern - This is a species listed as special concern on the SARO list and should be deleted from this group.</p>			
112.		Section 5.3 Development of Significant Woodlands Recommended Criteria - Age of the forest should not be dependant on size. You could have small woodlands such as 4 ha in size that could be considered Old Growth.	Size was not used to limit the age criterion – see section 5.4 – however, as an aside, we think the significance of such small woodlands is questionable – they may support old trees, but they will have few of the ecological characteristics of old woodlands, which what is really significant	None	Page 40
113.		Section 5.3.3 Age and Late Successional Woodlands, 12 th paragraph – Re: thresholds. OMNR could suggest some thresholds.	We recognize MNRs expertise with this and have indicated that when age is being determined as part of site specific studies, MNR be consulted.	Evaluation section of 5.3.3 was refined to add reference to consulting with agencies, including MNR.	Page 49
114.		Section 5.3.4 Slope, <i>Evaluation</i> - Although it may be decided that slope is not needed as a significance criterion, the reason for not including shouldn’t be because it is “not considered“ defensible, especially since this paragraph goes on to state that there is still value in protecting woodlands on slopes, just not as significant woodlands.	“Defensibility” was one of the criteria that the TAT agreed to for evaluating criteria, thus it is reasonable to reject a criterion for this reason. The explanation as to why it is not defensible is provided in the discussion in 5.3.4	None	Page 50
115.		<p>Section 5.3.15 Significant Species and Communities</p> <p>1st paragraph - Should also reference the SARO list and the Ontario Endangered Species Act, which includes 4 schedules listing all of the species that are at risk in Ontario.</p> <p><i>Thresholds for Region of Peel and Town of Caledon:</i> Re: Black Oak Deciduous Forest Type – This is a S3 community. Re: list of forest communities - Why are other rare communities such as treed cliff, talus and certain swamp types not included as well, especially since the communities listed above will be used for identifying SWH as well. There are also other communities that should be considered such as Sugar Maple-Oak and Sugar Maple Forest Types, Red Oak, White Pine-Red Maple, Sugar maple-Beech, Sugar Maple-White Ash, etc.</p>	<p>Agreed on first two comments.</p> <p>With regard to other rare communities, we point out that all S3 communities are included and we are not aware of any studies that identify locally rare communities that are not already listed.</p> <p>A discussion of SWH would be out of place and confusing in this section of the report – SWH is addressed in section 6.</p>	The text in 5.3.15 was amended to respond to the first two comments.	Page 62-63

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		This sentence should be expanded to state how these communities are used to in identifying SWH.			
116.		Section 5.3.16 Economic/Social Value, 4 th paragraph - Commercial forest operations can and do occur on the forest block sizes common in Peel. Ownership sizes may be generally too small for annual operations. Certification has been considered a tool by providing a framework for achieving sustainable forestry on the ground. Therefore, recognition of certification may have a place as a criterion if certified woodlands are not captured by other criteria.	This criterion received some attention at the stakeholder and public meeting and we were provided information by a local resident who is also a RPF regarding commercial operations in Peel. After discussion, the consultant team recommend that this is not a criterion we feel should be recommended in Peel.	None	Page 64
117.		Section 5.3.17 Floristic Quality Index, 4 th paragraph - The FQI would not be suitable for significance evaluation if it is applied as an average. However, consideration of the individual species can have a role in the interpretation of the species composition.	Consultant team does not fully understand the comment in the context of the evaluation of FQI as a potential criterion. the FQI should not be averaged. It yields two numbers which can be used to value areas with native vegetation in a relative way, or if measured over two points in time to monitor changes in floristic quality. The system was designed with these two goals in mind and the legitimacy of other applications is questionable.	None	Page 66
118.		Section 6.4 Defining Significant Wildlife Habitat – Re: Habitats for Species of Conservation Concern.	Accepted OMNR changes to this section.	<u>Habitats for Species of Conservation Concern:</u> Includes species identified as nationally endangered or threatened by COSEWIC (but not regulated under Ontario’s Endangered Species Act); provincially vulnerable <u>listed as a species of Special Concern on SARO list</u> , provincially rare or historical in Ontario	Page 74
119.		A4i Migratory Landbird Stopover Areas – Re: river valleys within 5 km of Lake Ontario and 500 m of river valleys within 5 km of Lake Ontario: Clarification may be needed as to whether this just applies to the Credit and Etobicoke or all watercourses that outlet to the Lake such as Cooksville Creek, Mary Fix Creek, etc. Same comment could apply to page 110.	Incorporated changes to clarify both river and creek valleys.	River and <u>creek</u> valleys...	Page 80
120.		B4 Foraging areas with abundant mast (i.e. fruit-bearing trees or shrubs) - Mast should also include nut-producers in addition to fruit-bearers. It should not be assumed that all forests with abundant hard (i.e. nut) mast will be captured by the provided SW criteria since those criteria do not specifically include patches with important components of Oak, Beech, Hickory or Walnut.	It has been assumed that most forests providing foraging areas with abundant mast (i.e., nuts like acorns and fruit bearing shrubs) will be captured by the significant woodlands criterion for size / interior, as well as the criterion for old growth, however in recognition that some areas may not be captured as significant woodlands, we are also recommending any ELC community dominated by mast	Revisions to table under criterion B4: <ul style="list-style-type: none"> • FOD 1 (Dry-Fresh Oak Deciduous Forest Ecosite), • FOD 2 (Dry-Fresh Oak-Maple-Hickory Deciduous Forest Ecosite) or • FOD 9 (Fresh-Moist Oak-Maple-Hickory Deciduous Forest Ecosite) to be 	Page 86

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			bearing species also be considered SWH under this criterion. No threshold could be developed for fruit-bearing trees and shrubs.	considered SWH.	
121.		<p>B8i Amphibian breeding habitat – Re: Group B Jefferson Salamander complex “hybrids”:</p> <p>This should be deleted. A Jefferson Salamander complex hybrid is an indication that there is/are Jefferson Salamanders in the area. Jefferson Salamander is a threatened species on the SARO list.</p> <p>Same comment applies to B8ii.</p>	It is the consultant team’s understanding that only when you have Jefferson Salamander complex ‘hybrids’ where the Jefferson Salamander genome dominates does it indicate the presence of Jefferson Salamander itself. This was confirmed by speaking with Dr. Jim Bogart (University of Guelph).	None.	Page 88
122.		<p>B10 Habitat for Area-sensitive Forest Interior Breeding Bird Species – “Therefore, it is recommended that mature forests / plantations with interior patch size ≥ 4 ha be considered SWH in the Town of Caledon and Region of Peel:</p> <p>In addition, mature forests with documented presence of 3 or more pairs of listed species should also be considered significant”</p> <p>This is worded slightly different than the Criterion B10 section on page 137. It is unclear in the chart as to whether the woodland needs to have interior forest > 4ha and have 3 or more pairs of listed species.</p>	To qualify as SWH, the interior patch size must be met or at least 3 or more pairs of listed species must be present.	The wording has been corrected and made consistent.	Page 90
123.		C3 Species that are listed as rare (S1–S3) or historical in Ontario based on records kept by the Natural Heritage Information Centre in Peterborough - Would this include S3S4 and S3? Species?	It includes only S1, S2 and S3.	None.	Page 93
124.		<p>C6 Species that are rare within the Regional Municipality of Peel/Town of Caledon, even though they may not be provincially rare:</p> <p>Re: Note 1 - <u>Note 1</u>: In addition, the significant species lists produced for the Oak Ridges Moraine Conservation Plan that are found in Appendix A of the ORM (Technical Paper 6) should apply to areas on the Oak Ridges Moraine and should be considered during development of a wildlife list.</p> <p>Re: Note 2 – Could delete Note 2 as it is a partial repeat</p>	Accepted OMNR changes to Note 1 and deleted Note 2.	Revisions made to criteria table.	Page 94

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		of Note 1.			
125.		C7 Species that are subjects of recovery programs – Re: Note 2: The three species listed in Note 2 are listed as either threatened or endangered on the SARO list and as per Note 3 are not part of C7.	Criterion C7 completely re-written (table and text in body of report).	Revisions made to criteria table.	Page 95
126.		Section 6.5.9 Criterion A4i: Migratory shorebird stopover areas, 7 th paragraph - The table for A4vi also identifies 100 or more individuals along the Lake Ontario shoreline and directly adjacent lands with the 75 figure being applied to inland lakes.	The text in the table was corrected. Annual aggregations of 75 is the threshold. An earlier version had been included in the table.	Revisions have been made to the criteria table.	Page 115
127.		Section 6.5.10 Criterion A5: Raptor wintering areas, 4 th paragraph - The Bald Eagle is listed as Endangered on the SARO list, therefore would be subject to policy 2.1.3 of the PPS.	Despite its status (which we acknowledge in the text) we decided to include just to be thorough. The text remains unchanged.	None.	Page 117
128.		Section 6.5.11 Criterion A6: Snake hibernacula, 9 th paragraph - These two species are listed as species of special concern by MNR and should be assessed as part of SWH.	Comment addressed by adding and additional sentence to the text.	Notably, Eastern Hog-nosed Snake, Milksnake, and Eastern Ribbonsnake were not considered for designation as part of this criterion since they are designated ‘Species at Risk’ in Canada and Ontario and as such are protected under other existing policies (i.e., Section 2.1.3 of the 2005 Provincial Policy Statement) and provincial and federal Species at Risk legislation. <u>Milksnake and Eastern Ribbonsnake are designated Special Concern by OMNR and their habitats are protected by SWH criterion C2 and C3.</u>	Page 119
129.		Section 6.5.23 Criterion B8i: Amphibian breeding habitat (Forested sites), 8 th paragraph - Same comment as provided for B8i in the table.	Same comment already addressed earlier in table.	Addressed through changes to the criteria table.	Page 130
130.		Section 6.5.24 Criterion B8ii: Amphibian breeding habitat (Non-forested sites)	Same comment as provided for B8i in the table.	Addressed through changes to the criteria table	Page 131
131.		Section 6.5.25 Criterion B9: Turtle nesting habitat and turtle overwintering areas, 1 st paragraph - The Northern Map Turtle is listed as a species of special concern and is considered to be part of SWH.	The consultant team believes that the reference to “policies” accurately reflects Northern Map Turtle. Habitat for Northern Map Turtle would be protected under SWH criterion C2 and C3 and therefore Section 2.1.4 of the PPS “significant wildlife habitat”.	None.	Page 132
132.		Section 6.5.33 Category C: Habitats for Species of Conservation Concern, 1 st paragraph - The PPS 2005 only	The entire first paragraph was re-written and this point was addressed.	Species considered high priority at the Provincial level are those that have been	Page 141

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		deals with Threatened and Endangered species that are designated on MNR’s species at risk list. Delete: “or designated as Endangered by COSEWIC at the national level”	Accepted OMNR change to this section.	designated Threatened or Endangered by OMNR or designated as Endangered by COSEWIC at the national level (see Section 1.5 for definitions).	
133.		Section 6.5.40 Criterion C7: Species that are rare within the Regional Municipality of Peel or Town of Caledon, even though they may not be provincially rare – This should be Criterion C6 as per the criteria table.	OK	The order and numbering of C6 and C7 was flipped to correspond with the table	Page 145
134.		Concluding Remarks - There should be a discussion regarding the need to have a guidance document such as an EIS preparation document (if it is determined to not include such information in this document) that speaks to how one carries out field work to determine if and what kind of SWH exists on any particular property. Direction should be given for the need for ELC and/or OWES to be used, 3-4 season surveys, etc.	Comment noted.	None.	Page 150
135.		Appendix 3: Digital data used and their sources - Should use the Pits and Quarry layer from MNR as it is probably more current than what is shown on the ARIP report maps produced by MNDM.	Comment noted.	None.	Page 164
136.		Appendix 4: Summary of Significant Woodlands Criteria Used by Other Municipalities and Recommended by Technical Documents in Southern Ontario: Re: York Region Study Size Criterion within York NSE (2005) – should also include woodlands ≥ 10 ha north of the Oak Ridges Moraine • Re: Halton Region Study Size Criterion (Gartner Lee Study, 2002): <ul style="list-style-type: none"> • urban ≥2 ha* (The * does not show up with an explanation in the notes section at the bottom of the table) • rural: • below escarp. ≥4ha • above escarp. ≥10ha 	Comment noted.	None.	
137.	Credit Valley Conservation (CVC)	It is important to recognize the fact that the proposed species and threshold will likely need regular updating as the natural heritage related data for the Region increases,	Comment noted.	None.	

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		as well as to recognize advances in the sciences. In particular, it will be important to update the criteria and thresholds to further address the impacts of climate change on the natural heritage system and its functions when appropriate.			
138.		CVC staff continues to recommend Option 2 (physiographic regions) for defining woodland patch size, which better recognizes the unique physical and ecological characteristics of the Region.	Comment noted.	None.	
139.		CVC staff continues to disagree with eliminating the interior forest criterion based on the fact that the size threshold adequately captures all woodlands with 4 ha of interior. As stated in our previous correspondence, woodlands with any interior habitat (or smaller threshold such as 0.5 ha) should be considered for protection, as they represent the last remaining habitat in Peel for disturbance sensitive species (both flora and fauna). These woodlands with smaller interior habitat represent opportunities for interior area enhancement through restoration, which could increase the interior area. A lack of protection for woodlands with smaller interior area may result in population declines of area sensitive species and the ecosystem functions they provide in the Region of Peel.	The consultant team has internally debated this criterion on several occasions and we may have to agree to differ on this point. The consultant team continues to feel that an area of interior of less than 4 ha is not sufficient to warrant significant status.	None.	
140.		The definition of watercourse, as defined by the <i>Conservation Authorities Act</i> , means “an identifiable depression in the ground in which a flow of water regularly or continuously occurs”. For consistency, CVC staff recommends replacing the currently proposed definition from Black’s Law Definition with the one used by the Conservation Authorities.	The recommended <i>Conservation Authorities Act</i> definition potentially captures swales and “other identifiable depressions”. This definition is considered to be too broad for the purposes of identifying whether woodlands are significant.	None. The Black’s Law Dictionary definition for watercourse is recommended for the purpose of the study.	
141.		Woodland interiors are mentioned as being valuable as per the PPS, “...key considerations (or criteria) identified are: woodland size, ecological functions (i.e. shape, proximity to other woodlands/habitat, linkages, diversity)...” This reference underscore the fact that the consulting team should include (or continue to include) a criterion that captures interior woodland function.	Interior woodland is noted as being important and is captured through other criteria.	None.	Page 6
142.		Re: Natural Core Areas and Corridors – changes to provincial wetland evaluation system now designate wetlands as Provincially Significant or Non-Provincially Significant.	The new wetland evaluation system will be reflected in changes to the ROP to conform to the PPS.	None.	Page 10

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143.		“Woodland”, first paragraph – although pre-European settlement vegetation in this area was likely forested, it consisted of upland and wetland treed areas (i.e. forests and swamps) as well as the scattered prairie and savannah remnants and small open marsh areas that are mentioned in the text. The statement that “...outside this, the natural vegetation was woodland” is mis-leading.	Agreed that reference to treed wetland (swamp) is warranted.	Text in section 3.1 was amended.	Page 22
144.		Paragraph 2 – An allusion is made to the fact that different size thresholds might be appropriate for urban areas. This idea is not carried forward in later section. On page 28 again, there is mention that smaller (<10 ha) forests in Brampton and Mississauga may be more important than similar sized forests in Caledon, but not sure if this concept is carried forward. The impression is that urban forests need to be protected by the municipalities and not by the Region.	This idea is carried forward and a recommendation is made for different size thresholds for the urban and rural systems. Additionally, it is noted that even smaller woodlands than those noted in the thresholds for urban areas may warrant protection and that this would be a municipal responsibility. See section 5.3.1.	None.	Page 28
145.		Paragraph 1 – What size cut-off is being used to determine the following, “In contrast, the Town of Caledon has 283 forest patches large enough to support area-sensitive forest breeding bird species”?	The cut-off is forests with forest interior (forest > 100 m from a forest edge). For a square woodlot, this equates to 4 ha, or a point of forest interior.	None.	Page 32
146.		Last paragraph – Glad that the Region of Peel has decided (at this point in time) to identify all criteria and any thresholds possible, even if they cannot identify (i.e. map) the SWH now. It is wise to specify what constitutes SWH in Peel so that those conducting EISs, NAIs, EIRs, etc. know what they need to look for.	Comment noted.	None.	Page 38
147.		“Local Level Context” – “The consultant team recognizes that smaller woodlands in urbanized landscapes may have a substantial social value that would warrant a threshold less than 4 ha for determining significance. The consideration of social values was deemed to be more appropriately addressed in a local context. If the Region recognizes that smaller woodlands have value, they would help to play a role in their protection. Otherwise there is less certainty that protection of smaller woodlots will occur at a local level.	Comment will be considered when developing policy.	None.	Page 44
148.		Re: Linkage – What is a “natural heritage study”? Is this referring to the ROP’s current Greenlands System? What about TRCA’s TNHSS and CVC’s TEEM? Will these be addressed and if so at what point?	A definition of “natural heritage study” will be provided within the report. Phase II of the Natural Heritage Policy Review, that is after the Region’s PROPR process is completed, will include an examination of the TRCA TNHSS and CVC TEEM with respect to implementation of those models within the Regional context.	Definition provided in “Definitions” section of the report.	Page 53

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149.		Re: Surface Water Quality and Quantity – What constitutes an “evaluated wetland”? At the June 17, 2008 Stakeholder Workshop this was discussed at it was suggested that any wetland evaluated by a conservation authority and submitted to MNR and by the MNR should be considered an “evaluated wetland”. Due to limited staffing conservation authorities, consultants and other agencies will evaluate wetlands on the behalf of a conservation authority. Therefore, evaluations by accredited agents (agencies) should also be considered.	<p>The definition of “wetlands” within the report will address what constitutes an “evaluated wetland”, which includes only those wetlands that would be defined as a wetland if evaluated using the Provincial Wetland Evaluation System. Unevaluated wetlands may be subject to evaluation in the future and a determination made that these features are wetlands in accordance with the Provincial Wetland Evaluation System - Southern Manual.</p> <p>Wetlands are defined in the PPS as: <i>“means lands that are seasonally or permanently covered by shallow water, as well as lands where the water table is close to or at the surface. In either case the presence of abundant water has caused the formation of hydric soils and has favoured the dominance of either hydrophytic plants or water tolerant plants. The four major types of wetlands are swamps, marshes, bogs and fens. Periodically soaked or wet lands being used for agricultural purposes which no longer exhibit wetland characteristics are not considered to be wetlands for the purposes of this definition.”</i></p>	None.	Page 58
150.		Paragraph 4 – Although the consultant team may feel that, “no sufficiently rigorous database” currently exists “to justify the inclusion of regionally significant species of flora, fauna or community” a great deal of information is currently available and certainly after the Natural Areas Inventory (NAI) for Peel is completed, a more robust set of data will be available. Staff recommend that some text be added to support the idea of “regionally significant” flora/fauna/communities being included at a future date (e.g. a 5-year review) if there is not enough time for the consulting team to analyze and draw conclusions from the data set currently available.	<p>With respect to significant wildlife habitat, criterion C-6 recommends use of the Draft OMNR Significant Plant List for the GTA (Varga et al. 2005) plant list, and also recommends development of a comparable list for wildlife using TRCA and CVC data as well as consideration for the significant species lists produced for the Oak Ridges Moraine Conservation Plan - Technical Paper 6 (Queen’s Printer for Ontario 2007b) although it was outside the scope of this study to develop such a list and have it peer reviewed (which is what should be done to develop something reasonably accurate and defensible).</p> <p>In terms of using such lists to identify significant woodlands, there was concern about the potential for the presence of a single regionally rare plant or wildlife observation resulting in an entire woodlot being designated as significant, and it was felt this would not be a defensible approach.</p>	None.	Page 63
151.		Criterion B4 – “Foraging Areas with Abundant Mast” may not necessarily be captured by the significant woodlands criteria. Staff is re-iterating this concern, noting specifically the consultant’s referral to “i.e. nut-	It has been assumed that most forests providing foraging areas with abundant mast (i.e., nuts like acorns and fruit bearing shrubs) will be captured by the significant woodlands criterion for size / interior, as well as the criterion	Revisions to table under criterion B4: <ul style="list-style-type: none"> • FOD 1 (Dry-Fresh Oak Deciduous Forest Ecosite), • FOD 2 (Dry-Fresh Oak-Maple-Hickory 	Page 86

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		bearing trees and fruit-bearing shrubs”. Abundant fruit bearing shrubs are often seen in successional habitats, some of which most certainly would no be captured by significant woodlands).	for old growth, however in recognition that some areas may not be captured as significant woodlands, we are also recommending any ELC community dominated by mast bearing species also be considered SWH under this criterion. No reasonable threshold could be developed for fruit-bearing trees and shrubs since this captures such a broad range of species (in theory, all of them) including a number of invasive species.	Deciduous Forest Ecosite) or <ul style="list-style-type: none"> FOD 9 (Fresh-Moist Oak-Maple-Hickory Deciduous Forest Ecosite) to be considered SWH. 	
152.		Criterion A2 – natural sites are mentioned but not defined. Recommend the consulting team provide a definition at this point (even though a definition is provided accompanying criterion A4i).	This was addressed in the table and body of the text.	None.	Page 79
153.		Criteria A2, A3 and B11 – all list a number of species/nests/pairs that can constitute SWH. Recommend phrasing be changed such that it reads “x number of nesting pairs of species A, species B...and/or species K. Note: these changes should also be reflected in the text sections for each criterion.	Consultant team is not sure how this recommended change makes it any clearer. Text left unchanged.	Text left unchanged.	
154.		Criterion A4iv – Although it is suggested that migratory butterfly stopovers are “likely covered by criterion A4i along Lake Ontario” it would be prudent to retain A4iv as a separate criterion. By retaining the criteria separate, regardless of the policy implications, we protect each habitat based on <u>all</u> of the reason it is significant, and if at some later juncture a criterion is dropped, that habitat could still be protected on the landscape due to its significance for other reasons.	Migratory butterfly stopover areas are a recommended criterion for the Region of Peel but not the Town of Caledon. The statement "Likely covered by criterion A4i along Lake Ontario" simply indicates some protection would also be provided by that criterion, not that the criterion isn't being recommended.	None.	Page 81
155.		Criterion B1 – Note 1 states, “Additional S4 and S5 ranked woodland ELC Vegetation types considered rare are captured by significant woodlands criteria for significant communities”. Although this is true, it would be nonetheless be prudent to list these communities under both significant woodlands and significant wildlife habitat.	The S3S4, S4 & S5 communities deemed appropriate were added to the table and body of the report.	The criterion has incorporated too much new text, as well as a new table, to list here. Please refer to the revised version of the report.	Page 85
156.		Criteria B8i and B8ii – Why are Jefferson salamander complex hybrids where Jefferson salamander dominates not included under Group B?	Due to its provincial conservation rank of S2, this 'hybrid' is automatically covered under criterion C3 "Species that are listed as rare (S1–S3) or historical in Ontario based on records kept by the Natural Heritage Information Centre in Peterborough".	None.	Page 88
157.		Criteria B10i, B10ii and B12 – editing suggestions	Done.	Editing made to report.	

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158.		<p>Criterion C4 – “For calling amphibians, population trend data would be based on the Marsh Monitoring Program or other suitable data source. There is no population trend data available for other wildlife groups in Ontario.”</p> <p>Frogwatch also runs programs that generate population trend data, as does Environment Canada: Amphibians Road Call Counts, Backyard Frog Surveys, etc. Some of these programs may be more appropriate for non-march dependent herpetofauna.</p> <p>Are there only avifauna species listed on the “currently experiencing substantial population declines” list, such as frogs? If so, they should also be listed.</p>	<p>The list of breeding birds was dropped for the reasons listed in the most recent version of the document. That said, all sources of population trend data for other wildlife groups should be considered, including the sources listed by CVC. The text was changed to reflect this.</p>	None.	Page 94
159.		<p>Criterion C8 – Need clarification as to what constitutes a “Conservation Advisory Committee” – is this the same as Caledon’s Environmental Advisory Committee?</p>	<p>Although the official mandate of the Caledon Environmental Advisory Committee was not reviewed, it is our understanding that most such groups are not asked to develop lists like those described in the criterion. They typically help review development applications for the jurisdictions they represent.</p>	None.	Page 95
160.		<p>Re: Black-backed Gull and Caspian Tern – Paragraph 2 and 3 – What constitutes “nesting on a regular basis”? For example, would 2 years or more be enough?</p>	<p>The text was edited to indicate what "regular" means. Twice every 10 years is recommended.</p>	None.	Page 101
161.		<p>Paragraph 3 – If it is known that only 5 Barn Swallow colonies were reported in Peel, and of those the 3 in Caledon had 23, 82 and 100 active nests, why then is 23 (or even 25) not being used as the threshold? By using the number 30, we are automatically saying that one of the colonies is not significant, even though there are only 5 region-wide.</p>	<p>The species commented on is Bank Swallow, not Barn Swallow. The decision to recommend 30 active nests as the threshold was made somewhat arbitrarily. A conservative number was deemed appropriate given the information gathered by the Ontario Breeding Bird Atlas but there was not specific information that suggested it should be 30 instead of 33 or 25.</p>	None.	Page 102
162.		<p>Re: “Cliff Swallow” – What is the justification for selecting 8 or more nests as a threshold in Peel – especially given the statement, “Given this fact, identifying and protecting colonial sites containing 8 or fewer nests, the provincial threshold, may prove to be of little benefit”.</p>	<p>Given the fact that most nests are not associated with naturally occurring sites, protecting a threshold lower than 8 did not make sense since the protection provided would only apply to a relatively small portion of the population.</p>	None.	Page 103
163.		<p>Re: Landbird Migratory Stopover Areas, second paragraph – Given the criterion refers to <u>stopover habitat</u>, and not <u>breeding habitat</u>, staff is not certain that the 10 ha threshold is appropriate. During migration, birds tend to be a lot less “picky” about the habitat they will use, certainly compared to the breeding season.</p>	<p>While migrant open-country birds species will likely use habitat patches smaller than 5 ha or 10 ha in size there was a conscious effort to try and protect the largest most significant of the sites. This explains the relative large thresholds for the cultural habitats. 10 ha was selected as the threshold for cultural habitats not directly on the lake because it was determined that sites not connected to the lake itself are of</p>	None.	Page 110

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			lesser significance. This is why the size threshold was increased from 5 ha to 10 ha. The comment that 10 ha patches are used to designate area-sensitive open-country breeding birds as SWH was included to help justify its significance with respect to migratory birds. The distinction was always clear.		
164.		Re: Waterfowl Stopover (or Staging) Areas (Aquatic) – Why are swans and mallards not included on the mainland list? Are these species considered so common that a grouping of 250 of them is not significant?	The threshold for the mainland list is 100 not 250. Yes, Mallard was not included because it was considered too common. Similarly, Tundra Swans can occur in large groups as well.	None.	Page 114
165.		Re: Rare Vegetation Communities, paragraph 4 – Although MAM2-6 and SWT3-2 communities would be protected as part of a Provincially Significant Wetland (PSW), it is important to map these communities as SWH independently. PSW files are open, meaning that it is possible that in the future, the wetland could lose its PSW status and/or be modified in some way. By designating these rare communities independently of the PSW process, an extra level of protection is afforded them.	Text in the table and report has been revised to list these habitats as captured by this criterion.	Wetland communities added to the habitats to be captured as SWH, as follows: <ul style="list-style-type: none"> • Broad-leaved Sedge Organic Meadow Marsh Type (MAM3-6) • White Cedar – Conifer Organic Swamp Type (SWC3-2) • Willow Organic Thicket Swamp Type (SWT3-2) 	Page 122
166.	Niagara Escarpment Commission (NEC)	Editorial comments received.	Will address comments when revising report prior public release.	Edits made to report.	
167.	Sierra Club of Peel	The report was very consistent with an inclusive and comprehensive, systems-based approach to environmental planning and watershed planning. The report used an ecosystem-based methodology and framework, which reflected input from all significant stakeholders including CVC, TRCA, OMNR, MPIR, MMAH, Municipal partners/stakeholders, community groups/ENGO's, etc. The key group that was not consulted were "First Nations" communities in the Peel and Caledon bioregions. This represents a significant loss to the qualitative rigor and richness of the perspectives highlighted in this report, and may alter the 'stories' that are told or allowed to be presented.	The Peel Region Official Plan Review (PROPR) process includes a strategy for consulting for the First Nations people. Consultation on this study and the PROPR Natural Heritage Policy Review will be done through that process.	None.	
168.		Generally, the scientific rigor of the report, in terms of its methodology are excellent; my only concern is the methodology and methods that are left out, including: metadata analysis, UFORE analysis and Socioeconomic and ecological valuation of natural capital provided by significant woodlands in Peel and Caledon areas being	These analyses are out of scope for this study. The Natural Areas Inventory (NAI) being led by Credit Valley Conservation (CVC) will compile data on flora and fauna in Peel within one comprehensive database with the intention to update the database on an on-going basis. As part of this work, quality control measures will be applied. The Toronto	None.	

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		highlighted in this report.	and Region Conservation Authority (TRCA) is leading an Urban Forest Study in partnership with the Region, the area municipalities and CVC, which is using the UFORE model to examine the urban forest structure and function in Peel Region. Both CVC and TRCA are undertaking socio-economic studies on the value of protecting and enhancing natural heritage. The research and findings of these studies are being considered as part of the PROPR Natural Heritage Policy Review.		
169.		For the purpose of fulfilling the criterion and indicators that would allow for the protection of the woodlots, significant habitats and potential habitat linkage/corridor and core habitat areas, it is necessary to conduct a PVA and MVP analysis (basic components of conservation biology), as well as a patch dynamics analysis and inventory (basic components of landscape ecology). My sense is these are lacking within this report.	<p>These analyses are not required for this type of study, which is a landscape scale analysis to determine appropriate and relevant criteria and thresholds for identifying “significant” woodlands and wildlife habitat as per the PPS. In applying these criteria and verifying “significance” through natural heritage studies such as an Environmental Impact Study (EIS), these types of site-level analyses may be appropriate.</p> <p>Notably, some patch dynamic analyses were conducted as part of criterion B5 – Highly Diverse Habitats, as well as for the significant woodlands criteria application. Furthermore, both PVA and MVP analyses require fairly comprehensive species data for the entire study area, which was not available at the time of this study.</p>	None.	
170.		<p>It is suggested that the stakeholders and all those involved in the drafting, management and finalization of the Draft Report in question, review the “Conservation Thresholds” for species that have already been written, that even though are outside of the study area, are transferable and applicable to the methodology in the Draft Report. The study is:</p> <p>Environmental Law Institute. (2005). <i>Conservation Thresholds for Land Use Planners</i>.</p>	<p>The consultant team has considered this document as part of their literature review.</p> <p>While this document is useful for supporting broad concepts in conservation biology and provides some interesting trends / ranges and data from the scientific literature, it provides no specific thresholds applicable to this study.</p>	None.	
171.		The study report will only be successful in protecting and enhancing the Region and Caledon’s woodlots and natural heritage/habitat if the Region and Caledon have strong policies in place, including a Tree Protection By-Law that restricts impacts on trees on Greenfield sites targeted for future development/growth. Further to this argument, the study will only be successful if the	<p>The Town of Caledon has a Tree Conservation By-law.</p> <p>Through the PROPR Natural Heritage Policy Review, Regional staff is updating Region Official Plan policies to conform to provincial policy. Phase II of this work will examine the integration of CVC and TRCA’s natural heritage system models with the Region’s Greenlands</p>	None.	

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		Region’s Natural Heritage system is very strong	System.		
172.		As per page 3 of the report, under s. 1.1, Study Purpose and Objectives, while there may be “insufficient information” particularly as it relates to unclassified wetland complexes and other terrestrial and aquatic features and functions, significant wildlife habitat on a Regional scale can be obtained from a UFORE analysis (see: www.ufore.org). The Town of Oakville has completed a UFORE Analysis, which was successful in demonstrating the socioeconomic values of their forest cover, including the carbon offsets and health benefits to residents and the Oakville community. Further, the Regional Municipality of York is now undergoing such an analysis. I think the UFORE analysis combines well with the site level studies (secondary plans, subwatershed studies, ground truthing, species inventories, Environmental Impact studies, environmental monitoring and assessments, etc) to provide a complete, multi-scale analysis of the site;	A UFORE analysis is out of scope for this study and is being done through the Peel-TRCA Urban Forest Study.	None.	
173.		Under s. 1.4 Legislative and Policy Context, it is fundamental that the Planning Act and Clean Water Act (2007) be included under the relevant policies being considered or applicable for this Draft Report/methodology;	The focus of this study is to provide technical guidance for the development of significant woodlands and significant wildlife habitat Official Plan policies in order to primarily conform to the PPS (2005). As such discussion on the Planning Act and Clean Water Act is not necessary for this study. Official Plan conformity with the Clean Water Act requires source protection plans to be completed and then approved by the Ministry of the Environment	None.	
174.		Under s. 1.4.1 Provincial Planning Initiatives, it is critical that rarity/occurrence of habitat matrix and mosaics in urban settings be considered (patch dynamics and landscape ecology methodology); This is essential for creation of conservation thresholds for urban species that are susceptible to habitat loss (especially if their habitat is below the 0.5 ha required to be “significant habitat/woodlots”;	This type of analysis was used as part of TRCA and CVC’s natural heritage system modeling. The Region will be examining the integration of this work into the Region’s Greenlands System after the PROPR exercise is completed. The Region will be considering natural heritage system modeling during Phase 2 of the Natural Heritage Policy Review.	None.	
175.		Under the s. 1.4.1 Provincial Planning Initiatives, titled “Greenbelt Plan”, it is fundamentally important for this draft report to consider agricultural lands as part of Natural Systems policies and to support the protection and enhancement of agricultural lands since they support	The stewardship of agricultural lands to enhance natural heritage features and their functions will be discussed in the PROPR Natural Heritage Policy Review Discussion Paper.	None.	

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		ecological restoration potential especially ‘pit and mound restoration’ and naturalization, act as grazing areas for migratory birds, provide critical landscape corridors and linkages. As such agricultural lands should be valued at a premium both as a cultural landscape and ecological potential site;			
176.		Under s. 1.4.2 Region of Peel Official Plan (p. 10), there is discussion of “Fish and wildlife habitats”. There is no mention of lakes, Kettle Lakes and Vernal pools; this represents a critical flaw – these habitats need to be included under “Fish Habitats”; therefore this Draft Report should explicitly reference the Conservation Authority Fisheries Management Plans, the OMNR requirements/definitions and the Remedial Action Plan (RAP) and DFO requirements and definitions/scope for “Fish and Wildlife habitats”, especially since there are higher level policy documents and legislation which guide and warrant protection of “Fish and wildlife Habitats”;	The examination of fish habitat as per the PPS (2005) is out of scope of this study.	None.	
177.		Under “Greenlands System in Peel”, in the same section (p. 10), the “Core areas” Category of the Greenland System should be strictly off bounds to dogs, pets and off trail usages, such as biking. There are certain “passive activities” such as dog walking which need to be made explicitly clear are not allowed for obvious reasons of potential spread of invasive species and/or parasites;	The policy of Regional Council is to permit passive recreation within the Core Areas of Peel’s Greenlands System. Passive recreation is defined in the Region Official Plan as, “characterized by low intensity outdoor pastimes, such as hiking, picnicking and bird watching, requiring minimal modification of the land surface and relatively few if any buildings”. The conservation authorities may wish to restrict particular passive recreational activities on lands they own within the Core Area of Peel’s Greenlands System, as deemed appropriate by the conservation authority. Legal tools are available to private landowners who wish to protect and enhance Core Areas located on their properties by restricting particular uses (e.g. conservation easement agreements and covenants).	None.	
178.		Under the same section as above (p. 10), there is discussion of “agriculture in the Region”. There is no mention of the Provincial Policy Statement (2005), Planning Act (PA), Places to Grow (PTG) provisions for agriculture, but seems to rest primarily on Greenbelt Act legislation and ROP Greenlands System. The ROP greenlands system is not sufficient to address habitat patches (below the 0.5 ha requirement to be “significant”) outside of the greenbelt, or smaller woodlots/habitats	The review of agricultural policies of the Region Official Plan is being addressed through the PROPR Agricultural Policy Review. An agricultural discussion paper is posted on the Region’s website: http://www.peelregion.ca/planning/officialplan/timelines.htm The Region’s Greenlands System is protected and enhanced at both the Region and area municipal level through the municipalities’ respective Official Plan policies and does	None.	

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		within the urban envelope;	include lands outside the Greenbelt and within the urban areas in Peel. It is important to note that this study is defining “significant” woodlands as per the PPS (2005), which directs municipalities to identify such woodlands that are ecologically, functionally or economically important. The definition of woodlands used in the study is consistent with the definition of woodlands within the Forestry Act and Oak Ridges Moraine Technical Paper for identifying significant woodlands, and concludes that treed areas less than 0.5 ha in size are not considered to be “woodlands”. The tree by-laws of the area municipalities may address the destruction of trees in these smaller patches.		
179.		With respect to s. 1.4.3 Town of Caledon Official Plan (OP), the results of this Draft Report for Significant Woodlots and Habitat, should ensure that Caledon develops specific policies for significant wildlife habitat;	As this is a joint study between the Region and the Town, it is the intention of both the Region and Town staff to consider the recommendations of this study when examining significant wildlife habitat policies for their Official Plan.	None.	
180.		The “Ecosystem Management Policies” (s.3.1) takes a broad, ‘ecosystem approach’ to land use planning, but is too vague and permissive to be of much use to prevent Greenfield lands and ecological habitat from being destroyed by low density development/separation of land uses and proposals for big box stores and low density subdivisions or mineral extractions;	It is not the intention of this study to provide technical guidance to the Town of Caledon for the review of their Official Plan Ecosystem Management Policies as they relate to Greenfield development.	None.	
181.		Under “Ecosystem Integrity Objectives” of the same section above (s.1.4.3) it is important to note that “ecosystem integrity” (structure, function and composition) is influenced and affected by human contact and activities, but do not hinge upon cultural communities and human activities (which only increase the level of habitat fragmentation and species loss in a given bioregion and site scale). Therefore it is absolutely critical to define which “cultural community” activities are warranted and desired and which are not, just so the right for ‘cultural communities’ does not open a window for habitat destructive activities or set a precedent for further erosion of habitat policies in Caledon and ROP;	In the context of this policy, a “cultural community” refers to a vegetation community that has been subject to human management in the past. A cultural community has the potential to become “natural” over time and in its current state may provide ecological functions important for supporting the Region’s Greenlands System. It is therefore, important to protect, maintain and enhance the ecological functions these vegetation communities provide.	None.	
182.		Under s. 3.1.2.1.2 of s. 1.4.3 (p. 11), it is not appropriate for Town of Caledon’s OP to take a permissive approach to ecosystem based planning – they use language and indicator words which frame the issue a certain way: the OP states “To protect, maintain and, <u>as appropriate</u> , enhance and restore physical and biological systems and	The review of the Town’s EPA policies is outside the scope of this study. Comments have been received by Town staff.	None.	

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		features that support ecosystem integrity and associated functions, processes, attributes, values...”. However the “as appropriate” makes the policies permissive and without regulatory teeth. This “as appropriate” wording is used throughout, and means that developers who cause impacts to natural heritage may not have to further enhance and restore ecological integrity within an area or site. This is not at all consistent with a “Ecosystem-based approach” to planning and land use that the OP claims to use. This can be remedied by setting specific criterion and indicators for “ecosystem-based planning” and ecological integrity of existing blocks/areas within Caledon;			
183.		Under s. 1.4.3 (p.11), “Ecosystem Planning Objectives”, s.3.1.2.2.2 should read “To identify, protect, maintain...integrity within Caledon through the implementation of <u>ecologically</u> appropriate development, designations, policies and programs”. By adding “ecologically”, it clarifies who the development and designations are appropriate for – the whole Caledon and ROP community, which in recent surveys, has identified their willingness to pay for habitat enhancements, protection and their concerns of environmentally inappropriate development within ROP;	The review of the Town’s EPA policies is outside the scope of this study. Comments have been received by Town staff.	None.	
184.		On p. 14, it is important to clarify and identify the difference between the two studies by Varga et al (2005) and Kaiser (2000), so as to create an objective and impartial (non-biased) evaluation of each, instead of simply saying that the Varga et al (2005) study be used because “it is more recent” (p.14). It is important that the respective stakeholders conduct a comparative analysis between the two studies and extract information/data and methodologies most relevant from both, instead of being partial to one, which may result in a more narrow and biased approach;	The use of either the Varga et al (2005) or Kaiser (2000) species list was discussed and vetted through the study’s Technical Advisory Team (TAT), which comprises staff from OMNR, CVC, and TRCA. Varga et al (2005) was chosen because it is the most comprehensive and up to date list of vegetation communities for Peel. In addition the Natural Areas Inventory being conducted for Peel by CVC will contribute to a better understanding of the species compositions in the Region. Therefore, the study team does not see value added in requesting the stakeholder group to undertake a comprehensive analysis of Varga et al (2005) and Kaiser (2000).	None.	
185.		Under “Keep Process of Identification as Simple and Objective As Possible” of s. 2.3 (p. 19), it is important that the third point in the first paragraph which reads “requiring that two or three criteria...” should not be used for habitat patches within the urban context, as this sets the burden of proof on the community which wishes to preserve urban habitat patches and significant	The study recommendation is to evaluate each criterion on its own merit. This means that each recommended criterion would then be applied individually and that areas meeting any one of the recommended criteria would qualify as either candidate significant woodlands and/or significant wildlife habitat.	None.	

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		woodlots/habitats (below the 0.5 ha), since two or three criterion must be satisfied. This is absurd because in the urban matrix, increasing the mosaics of habitat patches and restoring them is important, regardless of whether they satisfy two, three or more criterion for “significance”. All woodlots and habitats within the urban matrix are important regardless of the size, shape, structure or ecological integrity – the reason being is that all ecological habitat has ‘potential use value’ and potential restoration values, not just immediate ‘market’ and socioeconomic values;			
186.		Under the same section (s.2.3: p. 20), point #2 reads that quantitative data is most important; however it is important to not allow this comment to restrict or influence the range of “qualitative data” which is just as relevant and important. Therefore qualitative data must be incorporated into the criterion within the methodology and Draft Report.	The text simply states the use of quantitative data is preferred over qualitative information as it is generally more defensible. It does not preclude the use of qualitative information. However, field verification of significant woodlands and significant wildlife habitat through natural heritage studies, such as an Environmental Impact Study (EIS) might warrant the use of qualitative data in addition to the quantitative data.	None.	
187.		Point #4 of the same section states that there are “no clear standards that indicate when species richness becomes significant”. This is not correct. Population Viability Analysis (PVA) and MVP, as well as patch dynamics, used in conjunction with available conservation science (Lee et al 1998), and Environment Canada, CVC and TRCA and OMNR methodology for thresholds, allows for clear standards to be set;	Population Viability Analysis (PVA) is an ecological tool used to determine the viability of populations. Minimum Viable Population (MVP) is not an analysis per se, but a concept that is used to determine how small a population needs to be sustained before it is at risk of becoming extinct. Neither informs species richness. Lee et al is a land classification system. In addition, PVA does require more detailed data that is not available on a Region-wide basis. None of the suggestions provided can be used to determine thresholds for species richness.	None.	
188.		On page 26, under s.3.0 “Study Area setting”, the report states makes a critical assumption when comparing larger urban habitat patches in Caledon with smaller patches in Brampton and the rest of the ROP. Thresholds should be based on species needs and lifecycles and ‘ecological integrity’ (structure, function and composition) of a given habitat patch and bioregion, not relative size of municipal forest patches;	Thresholds, where appropriate, are indirectly based on species needs as this is often the basis for thresholds. For example the size thresholds are partially based on protection of interior woodlands, which is done mainly to accommodate area sensitive wildlife species. With regard to woodlands, the scale of the project is too broad to address individual species needs, and they are integrated into landscape level measures.	None.	
189.		Further to the argument above, they state that “It is worth noting that in some rural areas where agricultural practice has declined, the area of forest cover has increased since the early 1900s”. This statement is very important for two reasons: 1) it creates a strong precedent for restoration	Comment noted by staff.	None.	

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		and naturalization of agricultural lands and protection of them through Greenland securement/acquisition and land trusts; and 2) it is important to define the ‘quality’ of the re-growth, since much of this is secondary growth and doesn’t necessarily contain native species and therefore requires management intervention and restoration ecology;			
190.		At the bottom of page 26 (same section as mentioned above), I want to make it explicit that there is a need to conduct a UFORE analysis and monitoring of socioeconomic valuation of woodlands and habitat cover. This is most effective when combined with spatial and statistical analysis and may lead to the evolution of an advanced stage/level of understanding in the form of methodology, tests of successful habitat restoration and decision-support systems (DSS); what may be required is a strategic decision support system (similar to the Region of Peel Spills Response System);	A UFORE analysis is being conducted by TRCA as part of the Peel-TRCA Urban Forest Study. The study is to conclude by 2010.	None.	
191.		On p. 28 of the same section, at the bottom of the page it states that “smaller (<10ha) forests in Brampton and Mississauga may be more important than smaller woodlands in Caledon, since they represent a substantially greater proportion of the total forest cover in the urban municipalities”. This argument is flawed because it compares two specific ecological contexts and bioregions which are quite different; it also can be manipulated/taken out of context to set a precedent of rationale for development of smaller habitat patches and woodlot habitats within Caledon, which a PVA, MVP, UFORE mapping and ELC and remote sensing may reveal to be extremely important habitat patches or “islands” that facilitate species movement throughout the landscape matrix and act as critical habitat for species of concern, including migratory birds; or they may contain unclassified wetland complexes, etc that may not have been considered simply by disqualifying them simply because they fall below the 10 ha standard! It is absurd to classify patches of 10 ha or less as being ‘relatively small’ just because relative to larger contiguous natural areas/habitat patches in Caledon, they may be comparatively small. Doing so represents an unscientific, biased and highly irresponsible value-based method that	We stand by our comment and do not believe our argument is flawed – it is exactly because of the different ecological contexts that smaller woodlands are more valuable in one instance and not the other. This study is focused on Significant Woodlands – a study to develop an NHS for Peel is ongoing that will address other concerns.	None.	

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		is not scientifically sound or defensible. In fact, this contradicts with Table 3 (p. 29) of this report which clearly indicates that small forest patches predominate in all municipalities within Region of Peel (ROP);			
192.		Brampton has a high degree of habitat patchiness (as per P. 28); therefore this unique context must be taken into consideration when planning for these urban woodlots/habitat fragments;	Commented noted by staff.	None.	
193.	Gartner-Lee Ltd. (draft report comments)	GLL provided editorial and more substantive comments in a “track-changes” report that reflected. In discussion with the author of the comments, she indicated that they were for the benefit of the consulting team to address as they saw fit.	Editorial comments were incorporated into the report. Comments on content were considered and discussed, and the report was revised where appropriate.	Edits made to report.	
194.	Gartner-Lee Ltd. (letter comments)	GLL also provided a letter, addressed to the Ontario Stone, Sand and Gravel Association, providing general comments on the report. The letter is extensive in its comments and the key points are addressed below.			
195.		p. 2 criteria should be refined to those that are key, not those which capture the full range of woodland and wildlife habitat ... within the Region	The consultant team is of the opinion that the full range of woodlands and wildlife habitat should be considered, although only those that are significant should be identified by the criteria.	None.	
196.		p.2 ...the study should be framed to recognize that flexibility will be required...	This study is a technical study and to the extent that was possible did not address implementation issues. Flexibility will be addressed through the policy study that will follow the technical study.	None.	
197.		p 3. in the absence of a Natural Heritage Inventory for Peel/Caledon, and in the absence of research to help define significant functions... many of the thresholds are best guesses.	There is a substantial body of knowledge of the natural heritage of the Region, and there is ample knowledge of biotic resources within the consultant team and the CAs, who were contributors to the project, thus the report was not undertaken in a vacuum of inventory knowledge. Also, many, if not most of the criteria for SW are not reliant on detailed inventory, e.g., the conservation values associated with large woodlands is well understood without knowledge of species composition. It is true that greater understanding of species distribution would benefit the determination of some thresholds for SWH, and the report recognized this and allowed for refinement as more knowledge is gained. However, the thresholds that are suggested were the result of extensive discussion with some of the most knowledgeable ecologists in the province and represent far more than a “best guess”.	None.	

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198.		p. 4 Recommendation of significance in the absence of inventory is dangerous work. This study has gone a long way to reduce inaccuracy ... but significant data gaps remain and recognition of this is needs to be incorporated into the policy approaches.	The consultant team is of the opinion that the need for inventory is overstated, and this is commented on in the previous comment. Flexibility and the need to incorporate refinement based on field studies can be incorporated into the policy study as suggested.	None.	
199.		p. 4 a general comment is made on the limitations of the mapping.	Section 2.1 in the report specifically addresses the limitations of the mapping. However, this does not limit the validity of the criteria selection and evaluation. The mapping is simply an illustration of the application of the criteria and did not influence the evaluation.	None.	
200.		p.5 there is a general discussion about the benefits of setting targets and using these to focus the criteria	Target setting had been discussed with the TAC at one meeting; however, it was not considered to be necessary for the determination of criteria to identify significant woodlands. For most, if not all criteria, there is sufficient understanding of the impacts of fragmentation throughout s. Ontario to develop criteria and thresholds. Few, if any studies to determine SW in Ontario has used thresholds to make decisions on technically defensible criteria.	None.	
201.		p.5 It is noted that it would be useful to know how much woodland is protected through existing policy (e.g., Greenbelt).	This exercise was undertaken, at least in Caledon, as part of the decision-making that will be undertaken to develop policy.	None.	
202.		p.6 there is discussion on the definition of woodland, which recognizes the changes being proposed to the ELC manual. It suggests that Peel and Caledon should come up with their own definition based on a review of resources.	The definition has been refined based on other comments received, but still relies on the ORMCP definition as a basis and for interpretation. Much thought was given to this and it was discussed at TAC meetings. It was recognized that a lot of thought and review had already gone into the definition used on the ORM and that it would be prudent to recognize this. For that reason the ORMCP definition was used as a basis, with refinements that reflect comments received from stakeholders.	Changes were made to the definition of woodlands that address part of these comments.	
203.		pg 7 discussion about size comments on the need to consider the context of the surrounding landscape and composition of woodlands	The approach does take into account the surrounding landscape by acknowledging that smaller woodlands are (generally) less important in landscapes with higher forest cover. As a result, different thresholds are recommended for urban and rural systems in the Region. The presence of non-native species should not automatically result in the exclusion of woodlands – the study follows the guidance of the ORMCP technical papers with regard to woodland definition, which includes exclusion of plantations that are dominantly non-native. Other woodlands that are dominantly non-native are likely Cultural Woodlands, and the report has been refined to address these (section 5.2)	Changes were made to the definition of woodlands that address part of these comments.	

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204.		pg 7 suggests only using wooded valleylands for the proximity criterion	Non-wooded valley also serve as corridors and are often components of natural heritage systems for that reason, thus woodlands within 100 m will still benefit from their proximity to non-wooded valleylands and vice versa.	None.	
205.		pg 7 mapping is only a “point in time”	Agreed, but the mapping does not influence the criteria selection and is only for illustration of the application of criteria.	None.	
206.		p 7-8 it is noted that management is important	We agree. Although management is not the focus of this study, we agree that protection also requires management, and this is noted in the report.	None.	
207.		p 8 it is noted that it is important to consider the reason that species are rare and that the approach taken results in land use changes having to include habitat based solutions for species protection	We agree in part with this comment in that protection just habitat may not be sufficient to preserve species diversity, however, it is a necessary component. If there is no habitat preserved then no other conservation actions will None be successful. Thus we stand by our recommendation to use the presence of rare species as one criterion for conferring significance. This is also consistent with Provincial approaches.	None.	
208.		p 9 there is a comment regarding the rejection of forest certification as measure of economic significance	There seems to be some confusion as to whether the study was referring to certified forests or certified forest managers. The study referees to the former and is in reference to sustainably managed forest sites based on accepted principles of sustainable forest management.	None.	
209.		p 10 recommends not including poplar and birch in old growth definitions	We defer to the work of Uhlig et al in the identification of old growth woodlands. There are indeed old growth birch woodlands and these can provide the characteristics of old growth that are discussed in section 5.3.3 of the report	None.	
210.		p 10 comment regarding the proximity criterion (#4 in GLL table) suggests proximity should be determined through a site specific study and should exclude non-forested valleylands	The consultant team is of the opinion that there is sufficient evidence regarding the value of natural features that are proximate to one another that this criterion can be used without site-specific study. The issue of forested vs. non-forest valleylands is addressed above.	None.	
211.		p 10 flexibility should be provided for the criterion conferring significance where woodlands are within 30 m of a watercourse, surface water feature or evaluated wetland	This is mainly an implementation issue. For example, it may be permissible to re-align some minor watercourses or propose enhancement to provide functional benefits. However the reference to “compensatory mitigation” suggests a net benefit approach which the consultant team feels is not appropriate.	None.	
212.		p 11, item #6 in GLL table: does not take into account species that are of concern for reasons other than habitat loss ...	See response to comment on page 8 regarding using rare species to determine significance	None.	

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213.		pg 11 ... it is obvious that the recommendations do not rely on empirical data.	See response to comment from pg 3	None.	
214.		p 11-12 there is a general comment regarding the historical characterization of the Region and a suggestion that this does not provide an appropriate basis for a vision for the study.	The description of the Region and the Town of Caledon was provided simply for perspective and does not imply that it constitutes a vision or goal for protection. As noted above, the determination of targets was not a part of this study.	None.	
215.		p 12 if the intent is to maintain function, then an aggressive stewardship campaign should be launched so wildlife-human encounters do not result in the death of the animals	We agree that as part of a management component. as stewardship program would be beneficial. We agree that urban wildlife issues exist and that they need to be addressed, but that is an implementation issue and does not influence the significance of a woodland or SWH.	None.	
216.		p 12 simply identifying the habitat is not the solution is maintaining the function	As noted above, we agree management is also necessary, but management is not helpful if there is no habitat to sustain species, thus habitat protection is a necessary requirement.	None.	
217.		p 12 several policy related comments are made with respect to pits and quarries	These concerns can be addressed through the policy study which will follow this technical study.	None.	
218.		p12 a comment is made regarding the approach of relying on TP #2 for the ORMCP	The TP #2 was used as a basis for many of the thresholds, but each one was also scrutinized with respect to its applicability to the entire Region and the Town of Caledon. Extensive discussions were also held with Provincial wildlife specialists in this regard.	None.	
219.		p13 a suggestion is made on an alternative approach to addressing migration stop-over habitat on the Lake Ontario shoreline,	This criterion has been the subject of discussion since the initial draft was released and has been refined in the current draft report.	None.	
220.		p13 a suggestion is made to OSSGA whereby they could contribute to the maintenance of open habitat “on a rolling basis”	We agree that this would be a very good idea to investigate and may be one are where a net area approach could be considered. The consultant team disagrees with the statement about open areas being on steep successional curves. The rate of succession is highly variable and some open habitats remain static for long (e.g., 30 years) without intervention. Others will require periodic management, but this is not a reason to abandon the need to retain open habitat in order to retain biodiversity.	None.	
221.		p 13 there is reference to a number of specific comments that were provided in the report itself.	These have all be read and considered and refinements to the study report were made where warranted.	Where warranted.	