



May 28, 2020

Mr. Matt Coffey, MCIP, RPP
Planning Coordinator, Approvals
The Corporation of the County of Prince Edward
332 Picton Main Street
Picton, Ontario K0K 2T0

Re: Final Peer Review Comments, Pebble Beach East Campground, Prince Edward County, Ontario; Our File 5318

Dear Mr. Coffey:

On April 20, 2020, Michalski Nielsen Associates Limited submitted a peer review of the Environmental Impact Study prepared by Beacon Environmental (hereafter referred to as Beacon) for Pebble Beach East Campground in Prince Edward County. That review included ten recommendations for additional information from Beacon. On May 25, 2020, we were copied on a response package from the project planner, Ruth Ferguson Aulhouse of RFA Planning Consultants Inc. (hereafter referred to as RFA), which included a response letter from Beacon that spoke to each of our ten recommendations, together with an updated EIS, dated May 2020, incorporating those recommendations. In the pages following, we provide our final peer review comments. To facilitate your review, these final comments follow our earlier recommendations.

Earlier Recommendation #1: *Appendix B to the EIS should be updated to include global ranking status and native versus non-native status, to ensure consistency with the description of that appendix in the body of the report.*

The updated EIS appropriately addresses this recommendation. No further response is required.

Earlier Recommendation #2: *Please include additional detail on the findings of the bat survey work that was undertaken, and how such work impacted on project design and other mitigation measures.*

The updated EIS appropriately addresses this recommendation, although we note that the requested information appears to be found in Sections 3.2.3.3, 6 and 7 of that report, and not in Section 5 as indicated in the Beacon letter. No further response is required.

16 Robert Boyer Lane, Bracebridge, Ontario P1L 1R9
(705) 645-1413 www.mnal.ca E-mail: info@mnal.ca

Earlier Recommendation #3: *Please provide summary information on additional SAR species which have the potential to be found on or adjacent to the subject property. This could be accomplished by the inclusion of a SAR screening table, listing all species of potential relevance, a description of their habitat requirements, discussion of whether portions of the subject property or adjacent lands provide any potential habitat for those species and, if potential habitat is present, recommended measures to mitigate against any adverse impacts.*

The updated EIS includes a detailed SAR screening table. Additional detail is provided in the report text on the SAR assessment process that was completed. These updates appropriately address our recommendations. No further response is required.

Earlier Recommendation #4: *Please include some discussion of the nearshore fishery of adjacent Lake Ontario, and any associated fish habitat opportunities associated with Soup Harbour PSW.*

The updated EIS appropriately addresses this recommendation. No further response is required.

Earlier Recommendation #5: *Please include a more complete description of Soup Harbour PSW, to better describe how that wetland's features and functions give rise to its identification as a provincially significant feature.*

The updated EIS appropriately addresses this recommendation. No further response is required.

Earlier Recommendation #6: *Please include discussion of other potential candidate Significant Wildlife Habitat. Several other categories of potentially relevant Significant wildlife Habitat are listed in this peer review.*

The updated EIS includes considerable detail on candidate Significant Wildlife Habitat. This appropriately addresses this recommendation. No further response is required.

Earlier Recommendation #7: *Please clarify whether lands within 30 m of Lake Ontario, 30 m of Soup Harbour PSW, and 15 m of the small internal wetlands (with the exception of the intended road) are to be preserved/re-naturalized as buffers, and not simply act as setbacks. Any intended works or uses within those lands should be clearly specified.*

We appreciate the clarifications that were provided in the Beacon response letter regarding buffers. We note that one of the referenced sections in the Beacon letter on where this information is found in the updated EIS should have been section 4.4.2, not 4.2.2. We also note that the Development Site Plan, included as Figure 6 in the EIS, continues to refer to these buffers as setbacks. Nevertheless, the direct response in the Beacon letter of May 21, 2020, together with the text changes in the EIS, provide the necessary clarifications. As noted in RFA's covering note, there are opportunities for the municipality to ensure matters such as buffers are properly implemented as part of the Site Plan application process.

Earlier Recommendation #8: *Please provide greater detail and specificity on the proposed mitigation measures, to ensure these provide concrete instructions to guide the Site Plan process. In doing so, expand on those recommendations relating to Significant wildlife Habitat and SAR, as may be appropriate, based on the additional requested analysis of SAR habitat and Significant Wildlife Habitat.*

Section 6.1 (not 61 as referenced in the Beacon letter) provides good summary information on the proposed mitigation measures, and does include more specificity than was provided in the earlier EIS. As noted in the covering email prepared by RFA, there is an opportunity for the municipality to ensure the necessary additional details on how such measures are to be implemented are included in the Site Plan application. No further response is required.

Earlier Recommendation #9: *Please update the discussion in Section 7 of the EIS regarding policy conformity with respect to Significant Wildlife Habitat and SAR, as may be necessary, on the basis of the additional analysis we have recommended on those two matters.*

The updated EIS appropriately addresses this recommendation. No further response is required.

Earlier Recommendation #10: *Please include a recommendation in the EIS that Beacon Environmental review the later Site Plan details to ensure these are fully consistent with the direction of the EIS recommendations, and provide sign-off to the County to that effect.*

Our recommendation that Beacon review the later Site Plan details has been substantially addressed, through Beacon’s inclusion of additional detail regarding required mitigation measures in its EIS, and with the final recommendation in the EIS indicating that these recommendations are to be carried forward as conditions of draft approval, as applicable. The covering email provided by RFA also notes that there will be an opportunity for the municipality to ensure that these matters are properly addressed through the Site Plan application process. No further response is required.

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In closing, the response letter prepared by Beacon to our peer review, together with the updates to the EIS and clarifications on the Site Plan application process provided in RFA’s covering email, appropriately address all of the recommendations of our original peer review. We appreciate the efforts made by the applicant and their project team in preparing this response. I trust this sign-off letter appropriately addresses the County’s requirements in relation to the finalization of our peer review but would be pleased to respond to any questions staff or Council may have.

Yours truly,

MICHALSKI NIELSEN ASSOCIATES LIMITED

Per:



Gord Nielsen, M.Sc.
Ecologist