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Submitted: May 15th, 2013

Comments of Concern: Re: EBR 011-8756 – Sumac Ridge Project – Gray Road – Proposed Transmission Line Corridor

Gray Road is an unassumed road within the Township of Manvers that has its roots in pioneer days dating back to the mid-1850s. This 1.9 km unassumed road is the proposed route for the transmission line to connect from the turbine locations westward to the switching station to be built on the west hand side of Hwy 35. This narrow road/pathway is owned by the City of Kawartha Lakes.

The wpd Canada proposal indicates on maps that this transmission line will consist of **aboveground cabling** (i.e.: Figure 1 Sumac Ridge Wind Project - Project Area & Aquatic Features – Water Report & Environmental Impact Study). However, in correspondence with project manager Kevin Surette, Communications Manager, dated July 4th, 2012 after the application for approval had been handed in to the MOE on June 29th, 2012 in response to the following question; it appears that the developer had not decided whether the transmission line would be above or below ground.

“How many trees - species and number will be removed along Gray Road?”

We are not at the construction phase of the project yet. We will avoid cutting trees where possible. It is undetermined at this point whether the collector line along Gray Rd. will be below or above ground.

In follow-up correspondence dated September 27th, 2012 from Jonathan Clifford, REA & Research Specialist for wpd Canada , it is indicated that the transmission line along Gray Road will be underground.....NOT what is indicated on the maps in the application sent as part of the application for project approval .

“What happens if the municipality does not grant permission for tree removal - i.e. Gray Road?”

“While a tree cutting by-law does not exist for private property wpd would still need to apply for other permissions and permits to construct on or around municipal right of ways. For Gray Rd our intention is to bury the connection line underneath the middle of the road to reduce. Final specifications of the connections lines and the route will be determined in agreements with the municipality.

The collector line if buried will be about one metre deep.”

In the Amendment section of the Consultation Report as part of the REA application it is stated:

Table 3.4: Summary of REA Report Amendments

Amendment	Reason	REA Report Reference
All Reports and Appendices		
Removal of references to overhead line along Grey Road	Not known at this time if aboveground or belowground along this stretch	

In either case, whether above ground or below ground, the construction of the collector line will produce serious, possibly irreversible environmental impacts along the length of Gray Road.

The consultants who prepared the Natural Heritage Assessment reports visited the Sumac Ridge project area briefly on June 14, 2010, June 15, 2010, July 2, 2010, November 11, 2010, April 4, 2011, January 16, 2012, January 24, 2012 and March 26, 2012. The field notes indicate that surveys lasted 15 to 45 minutes. Yet, it takes almost an hour to walk the length of Gray Road.

As stated on page 15 of the *Water Report & EIS Study* aquatic surveys for the entire project area were conducted during four visits on August 19, 2010, April 4 and 5, 2011 and March 26, 2012. On two of those dates April 4, 2011 and March 26, 2012, natural heritage assessments were also being conducted by this very small staff of six of which

one is a GIS technician and would not be involved in in-house surveys. One of the staff members who participated in the very brief water assessments, according to the qualifications statement has experience in the field of urban forestry but not with aquatic surveys. None of the individuals who conducted the water assessment on the complex Moraine water system are qualified hydrologists or hydrogeologists.

Three surveys were conducted by Ms. Storm and Ms. Zednik. These surveys were conducted on April 15th, April 19th and May 5th 2013.

Ms. Storm has extensive experience and training in the fields of wildlife and native plant ecology. Ms. Storm's training and education includes an Environmental Geoscience Technologist diploma (Fleming College), Ecological Land Classification (ELC) certification (Ministry of Natural Resources) and Sustainable Landscapes Certification (University of Guelph). Ms. Storm has also received training and is experienced in amphibian identification and monitoring, wildlife tracks and signs, butterfly and native plant identification. In addition Ms. Storm has work experience with the Ministry of Northern Development and Mines as well as the Ontario Geological Survey and is associated with the Central Lake Ontario Conservation Authority.

Ms. Zednik has experience in assisting the Ganaraska Region Conservation Authority with native plant restoration projects. She has also grown out seeds for the Plant Gene Resources of Canada seed bank for several years and is a participant in the current Swamp Aster - *Aster puniceus* native bee pollination study. She has considerable experience in the world of horticulture and has completed several degree level courses through the University of Guelph including courses on tree identification and care, soil structures and landscape sustainability. Native Carolinian tree species and species at risk native plants have been introduced to her property. Ms Zednik is the recipient of the 2010 Moraine Hero award for her efforts dedicated to the environmental stewardship and protection of the Oak Ridges Moraine.

The Surveys

This first survey was conducted from 9 am to 12 pm on April 15th. The skies were clear and the temperature upon arrival was 8°C and rose to 20°C upon departure, three hours later. The second was conducted on Friday April 19th between the hours of 6 and 8 pm. The temperature upon arrival was 7°C and dropped later on to 6°C. There were gusty westerly winds between 50 to 70 kph that created whitecaps on the three acre pond. The third visit was conducted on May 5th. The skies were clear, the winds calm and the temperature was 23°C.

Gray Road is inaccessible most times of the year by regular vehicular traffic. The roadway on April 15th and 19th was severely rutted in sections and muddy to a depth of approximately 60 cm. Even on May 5th after a prolonged rain-free period, it was still very muddy in several sections. The only sign of any traffic aside from deer and wild turkey tracks were those of an ATV vehicle and horses. One ATV rider and a pair of horseback riders were the only humans spotted during the three survey visits.



Gray Road is not a 'road'. Note: three photos are from August 22-25, 2012 to demonstrate to full measure and scale of vegetation coverage along Gray Road.

The water assessment report acknowledges the presence of one seep along Gray Road as S3 on the *Project Area & Aquatic Features* map. Onsite investigation indicates that Seep # 3 (S3) is actually not a seep but a watercourse. Seep #1 (labelled S1 on the Aquatic features map) is located at the western end of the pond as part of water feature PRT2. However, there is also another seep along Gray Road that has **NOT** been identified either in the assessment reports or on the maps. It is located directly in the centre of Gray Road approximately 100 metres in from Highway 35. A second seep, also not identified by the proponent is approximately 5 metres further eastward. Both of these seeps have created depressions which are water filled at all times of the year. On August 25th, 2012, during a regional drought event, a visit to Gray Road found these two seeps to be filled with water. Green frogs inhabit these seeps.



Permanent seep in the middle of Gray Road – not identified in the water report. Green groggs inhabit the seep from spring until fall.

The roadway was also flooded with water in one section - part of a more complex unrecorded watercourse approximately 60 metres east of the pond location on Gray Road. This water feature was identified as S3 (Seep 3) in the wpd Canada water assessment report. There is an approximately 20 cm diameter pipe inserted into the side of the hill of the Moraine. Visual observations indicate that water flows out this standpipe on a continual basis down the hillside north and across Gray Road. There is also indication of supplemental seasonal flow by run-off flow from the east. This site, as one can see in the included photos has created a 5 metre pool of water along the roadway. This area is wet year-round. The water flow is directed into mixed woodland (identified by wpd as FODM5-1). Remnants of a broken concrete culvert were found on the north side of Gray Road indicating that at some point, an attempt was made to provide some form of cross road drainage. The banks of the stream are approximately 40 cm deep; an indicator that this waterway has been in existence for an extended period of time. The Water Assessment report states that S3 does **not** connect to any aquatic features (pg. 23 section 7.4 Seepage Areas of the *Sumac Ridge Draft Water Report*). This water feature S3 needs reassessment since it is clearly part of a more complex water system and **does** connect to other aquatic features. Fish habitat has been identified by the proponent as being downstream of PRT1 of which this watercourse empties into. The need to reassess this water feature is made more pressing since the Water Report prepared for wpd Canada Corporation indicates that it will not be possible to mitigate damage caused by interference with the seep (spring) along Gray Road - **“It will not be feasible to mitigate sediment entrainment into the seep using standard methods.”.... The mitigation strategy is “to complete work as quickly as possible”.**

Considering that the proponent may wish to construct the transmission line at a depth of one metre below ground along Gray Road, there needs to be a precise and accurate

mitigation strategy. Measures to protect possible fish habitat when carrying out a stream crossing under DFO regulations must be adhered to.



Water flows out of the pipe in the rise of the hill across Gray Road into a deep cut stream. The flow causes deep muddy conditions across the roadway.

Field notes accompanying the wpd Canada Water Assessment & EIS report indicate that the 3 acre pond as part of water feature PRT2 was only surveyed for 45 minutes on April 4, 2011 when ice covered the pond.

It is admitted in the field notes as well as the natural heritage assessment that the pond is fed by Moraine based groundwater to the south and east. During the field survey of April 19th, 2013, eight Buffleheads (*Bucephala albeola*) – two males and six females were spotted on the pond. There were also four Common Mergansers (*Mergus merganser*) all males. Numerous spring peepers could be heard. The wooded area along the south side of the pond contains trees with several good sized cavities that

would suit cavity nesting waterfowl such as Buffleheads and Mergansers. Buffleheads are cavity nesters, nesting cavity of their metabiotic host, a woodpecker, or the Northern Flicker. A pileated woodpecker (*Dryocapus pileatus*) could be heard during this survey.

The Common Merganser prefers to nest in hollow trees. Moreover, the Common Merganser is exclusively a fish eater. According to the wpd Canada field survey conducted while the pond was covered in ice on April 4, 2011, concluding notes indicate that it was unlikely that fish would be present. The field notes also indicate that if fish by chance were present they would be 'small individuals due to lack of depth'. However, since the pond was still ice-covered, it would be impossible for a depth measurement to be taken.



Buffleheads on pond – the far side contains a mixed forest. The far side of the pond also includes several half-submerged dead trees – habitat for many wildlife species.

During the April 19th, 2013 survey, numerous spring peepers (*Pseudacris crucifer*) could be heard. On the May 5th, 2013 site visit, green frogs (*Rana clamitans*) were observed in the seep that was not recorded in the Natural Heritage assessment report. Over a dozen green frogs (*Rana clamitans*) were observed in this same seep on August 25th, 2012 in a time of prolonged drought.

Under the Significant Wildlife Habitat Technical Guide that developers are to use for project site evaluations, the SWHTG states that the following are to be designated as Significant Wildlife Habitat:

“Any wetland with 20 or more frogs or tadpoles, a single snapping turtle nest, movement corridors where toads, salamanders, frogs or deer move from location to location, and any spring or "seep" where groundwater comes to the surface.”

These elements are all present in the Sumac Ridge project area and are present along Gray Road. Gray Road has not been evaluated.

The seep needs to be assessed.

A salamander survey was not conducted by wpd, but several vernal pools and wetlands located on the north side of Gray Road in WOD-007 would support salamander breeding grounds. There is no indication that proper salamander surveys were undertaken as part of a Natural Heritage Assessment along the length of Gray Road. These surveys would need to be undertaken in late March/early April. The pond along the south side of Gray Road has been identified by Ortech as snapping turtle habitat. Egg remnants have been found along the roadside.



Section of one of the many vernal pools found within WOD-007 within 120 metres of Gray Road.

Survey visits on all three occasions saw evidence of deer tracks and droppings along Gray Road. There was also evidence of multiple white tailed deer runs crossing Gray Road, as well as coyote scat along the length of the path/roadway. An extensive and multiple branching deer corridor was located in woodland - WOD-007, of which an acre is to be removed next to a wetland in order to accommodate the construction of Turbine # One. This trail system included deer rubs. Fresh droppings were evident along the trail system. There was evidence of multiple laydown areas in the field adjacent and west of WOD-007 and north of Gray Road. The extensive deer trail system in this woodland extended into the proposed site for Turbines # 1 and 3. Deer tracks and a trail crossing were noted across PRT3 – Pigeon River Tributary # 3. The proponent did not conduct a deer movement corridor investigation.

In light of this information, it is paramount that further investigations into deer movement corridors be undertaken.



Deer corridor in WOD-007. This corridor wound its way from Gray Road through a mixed mature deciduous forest (white and red oak, beech, maple) through a coniferous plantation of white spruce and tamaracks (as noted in the photo) and on into another mature mixed forest and valleylands at the site of Turbine # 1.



Deer tracks along Gray Road. Tracks were observed on each of the site investigations.



Deer rub along one of the deer corridors in WOD-007. The corridor can be seen as the bare worn ground on the left hand side contrasts to the leaf covered ground on the right.

Even on these three short early spring site surveys, Gray Road was teeming with wildlife. There were several encounters each time with ruffed grouse (*Bonasa umbellus*). They were spotted feeding on poplar buds.

Several wild turkeys (*Meleagris gallopavo*) were spotted on two of the survey visits. One was spotted roosting in a hemlock tree within 6 metres of Gray Road. On all three occasions, three turkey vultures (*Cathartes aura*) were spotted circling the project area. A red tailed hawk (*Buteo jamaicensis*) was spotted as well as a Cooper's hawk (*Accipiter cooperii*). Woodcock were heard on the April 15th, 2013 visit. The environment throughout the Sumac Ridge project site would support owl and whippoorwill populations. However, there is no evidence that night time surveys for these bird species were conducted on the part of the proponent as part of the Natural Heritage assessment.



Porcupine scat and habitat with 120 m of Gray Road. Several red squirrel midden piles were spotted along the roadside.

The Natural Features indicate that winter raptor monitoring occurred at three stations along Gray Road. Gray Road is not maintained in the winter. According to the field notes, winter raptor monitoring took seven minutes. It would take longer than seven minutes on snowshoes to reach the mapped monitoring stations. At the second public meeting, it was indicated by a representative of NRSI that the seven minute raptor surveys were conducted from a vehicle. This would be nearly impossible to do along Gray Road at the designated monitoring stations at the best of times due to the road conditions. Gray Road is an unmaintained narrow roadway with no possible turning area for vehicles and no alternative exit to another roadway to the east of Hwy 35. It is interesting to note and of concern that on the Sumac Ridge Wind Project Natural Features with Project Locations map, that one RWA – Raptor Wintering Area Monitoring Station is in the approximate location where a stick nest in a Scots pine was spotted directly south of Gray Road at (UTM 0688598 4891461). This stick nest was not noted or investigated as part of the Natural Heritage assessment.



This nest along Gray Road is located within 20 metres of the proposed transmission line and in the designated RWA area.

Several birds' nests were visible along both sides of Gray Road. These nests will not be visible when the trees and shrubs are leafed out. It would be very difficult to find these such nests as suggested as a mitigation strategy by the proponent if vegetation along the 1.9 km roadway is to be removed.

Pileated woodpeckers (*Dryocopus pileatus*) were heard calling as were brown thrashers (*Toxostoma rufum*). A species at risk Acadian flycatcher (*Empidonax virescens*) was spotted in the hedgerow along Gray Road. American robins (*Turdus migratorius*), Black-capped Chickadees (*Poecile atricapillus*), and American Goldfinches (*Spinus tristis*) were present.

Aside from much evidence of deer, coyotes and raccoons, there were also several red squirrel midden piles to be found along the roadway especially throughout the coniferous plantation. The usually nocturnal snowshoe hare (*Lepus americanus*) was spotted during the evening survey on April 19th.

A few early spring insect arrivals were spotted such as the Spring Azure (*Celastrina ladon*), Mourning Cloak (*Nymphalis antiopa*) and Compton Tortoiseshell (*Nymphalis vaualbum*) butterfly.

According to the SWHTG candidate bat maternity colonies are identified when snag/cavity tree density is equal or greater to 10 snags per hectare of trees 25 cm or greater at breast height.

According to the July 2011 MNR document on bats and turbines

“Bats may be indirectly affected by wind power projects through effects on habitat and behaviour. Bats may be displaced from suitable habitat due to habitat loss or fragmentation during the construction and/or operation of a project, human activity, or noise (e.g. construction activities, roads, turbines, etc.). Deforestation associated with a project may remove woodland habitat important to breeding or roosting bats. Bat habitats may be affected by turbines placed near bat swarming and hibernation sites, breeding or roosting habitats, or migration stopover areas. High levels of bat activity have been documented in forested ridge habitats, forest canopy openings, and along the shores of large waterbodies. These areas may offer attractive migratory and feeding habitat for some species of bats, which may lead to increased bat activity and mortality risk.”

The following photos taken within 120 metres of the proposed transmission line along Gray Road and within the sites of Turbines Numbers 1 and 3 indicates a need for further bat habitat assessment surveys. These are just a few snags photographed in



WOD-007.





A great variety of vegetation was present along the length of Gray Road, likely due to the varying saturation levels and composition of the soils. From the entrance to the pathway known as the unassumed Gray Road the soil is clay loam over gravel till until approximately 20 metres past the area designated Seep 3 (which is appears actually to be a continual stream originating within the Moraine). At this point it becomes very sandy (UTM 0688572 4891455) and the change in vegetation reflects this. Some sections of silt loam were also found.

<http://sis.agr.gc.ca/cansis/publications/surveys/on/on9/index.html>



Pontypool sand conditions that are prone to erosion – section of Gray Road is pure sand.

Vegetation observed along the hedgerow from Highway 35 to the western edge of WOD-007 included *Alnus viridis*, *Malus domestica*, *Fraxinus pennsylvanica*, *Viburnum dentatum*, *Tilia Americana*, *Rhamnus alnifolia*, *Thuja occidentalis*, *Prunus virginiana*, *Cornus alternifolia*, *Cornus sericea*, *Cornus racemosa*, *Sambucus racemosa*, *Toxicodendron rydbergii*, *Parthenocissus quinquefolia*, *Viburnum nudum*, *Rubus idaeus*, *Betula alleghaniensis* and *Rosa setigera*. Much of the understory vegetation was dormant at the time of the three surveys.



Photos of Gray Road taken between August 22 and 25, 2012 showing sections of the hedgerow and that Gray Road is not a road in the commonly understood sense of the word.

The woodland identified as WOD-007 in the Natural Heritage assessment consists of two distinct areas – one is a mixed mainly mature deciduous forest; the other consists of a mixed coniferous plantation.



The deciduous woodland that extends along the north side of Gray Road and does extend into the south side was dominated along the eastern rise by *Quercus alba* and *Quercus rubra*. Several mature *Fagus sylvatica* specimens were noted; some showed signs of beech bark disease. *Acer rubrum*, and *Acer saccharum* dominated the lower area. There were several *Tsuga Canadensis* throughout the maple forest. The forest floor contained a diverse mix of spring ephemerals and ferns including *Uvularia grandiflora*, *Sanguinaria Canadensis*, *Caulophyllum thalictroides*, *Petasites frigidus*, *Columbine canadensis*, large swathes of *Asarum canadense*, as well as *Geranium robertianum*, *Erythronium americanum*, *Claytonia virginica*, *Trillium erectum*, *Trillium grandiflorum*, *Trillium cernuum*, *Viola pubescens*, *Maianthemum canadense*, *Hydrophyllum virginianum*, *Polystichum arostichoides*, *Onoclea sensibilis* and pockets of unidentified species of *Carex* to name a few. Page 55 of the Natural Heritage assessment report, the assessment that, **“Groundcover is relatively sparse and there is evidence of logging within this community”**... is inaccurate, as is the statement **“*Cynanchum nigrum* is abundant in the subcanopy, with occasional goldenrod species and black raspberry (*Rubus idaeus* ssp. *Melanolasius*)”**.



Bellwort, Blue Cohosh, Columbine, Virginia Waterleaf and Trilliums



Section of forest floor covered with wild ginger.

The coniferous plantation contained large groupings of *Pinus sylvestris*, *Pinus strobus*, *Abies concolor* and *Larix laricina*.

Some vegetation of note along Gray Road:

1. A hundred year old plus *Pinus strobus* is located at the edge of Gray Road on the north side (UTM 0688641 4891493). The trunk circumference is approximately 260 cm at a height of 1.2 meters off of the ground. Whether the line is constructed underground or aboveground, the removal of this ancient tree might be necessary. Construction practices will interfere with the tree's extensive root system.



2. An isolated patch of club moss *Lycopodium obscurum*. It prefers humus-rich, sandy, moist but not completely saturated soils.
3. A stand of *Taxus Canadensis* (Canada yew) (UTM – 0688235 4891333). According to the Ontario Ministry of Natural Resources, "Canada yew is important for wildlife. Hardwood forests with yew tend to have a greater diversity of small mammals than forests without yew. Deer and moose eat yew, especially

during spring and fall. Songbirds often feed on the red false-fruits of the yew when they ripen during summer. Commercial nurseries sell varieties of Canada yew as ornamental shrubs for domestic landscaping. More recently, Canada yew has become highly valued by the pharmaceutical industry for its medicinal qualities, and it is currently being used to produce drugs that fight ovarian, breast and non-small cell lung cancers.”

http://www.mnr.gov.on.ca/en/Business/SORR/2ColumnSubPage/STEL02_163447.html

About 77% of all forest plant species (including some endangered taxa) occurring in the neighbouring forests are also found in the adjacent hedgerows. ([Biological Conservation Volume 142, Issue 11](#), November 2009, Pages 2522–2530) Environment Canada has conducted many studies on hedgerows...and concludes: “Biodiversity was always highly significant between hedgerows and fields at all trophic levels” as well as: “Habitats are important to wildlife in agroecosystems”. The removal of hedgerows will remove habitat that will affect many generations of avifauna

Many springtime ephemerals were encountered within the hedgerows along Gray Road. Species included Mayapple (*Podophyllum peltatum*), Bloodroot (*Sanguinaria Canadensis*), Trout Lily (*Erythronium americanum*), Yellow violets (*Viola sp.*) and Canada Mayflower (*Maianthemum dilatatum*).

One vegetative species noted was an invasive species that has only begun to take hold along Gray Road – dog strangling vine (*Cynanchum rossicum*). This highly invasive and destructive species was found along edges of clearings. Large stretches of cleared areas hedgerows and woodland perimeters in conjunction with compacted soil through construction work will support this opportunistic species. *Cynanchum rossicum* is incredibly difficult to eradicate as conservation authorities across Southern Ontario will attest to. Although the proponent states no herbicides will be used, the only effective measure at this time to deal with *Cynanchum rossicum* – dog-strangling vine is by the use of herbicides. If an herbicide is used, remaining native species will also be eradicated and groundwater sources will be affected. The Sumac Ridge project is located in an area of a High Vulnerability aquifer. Gray Road is located within an area of a highly complex water system.

The mitigation strategy under the EIS suggests that a simple sowing of seeds and tree seedling planting will remedy the destruction of the interconnected and diverse areas along Gray Road. If restoration as outlined in the EIS and Construction Reports was that simple, then 1000s of desecrated acres across the province would be restored to their natural native state in the blink of an eye. This has not been the case, and is not the case.

Finding a local seed source and enough seed to replace vegetation to be removed in the project area will be very difficult and expensive to do. Native plant seeds are very expensive because they need to be collected at the right time and place, usually by hand, and cleaning them takes time and specialized equipment. There are few bulk suppliers of native seed and plants and tree seedlings in Ontario. Many native seeds are one the most difficult to germinate. They require precise climatic and environmental conditions and often several season cycles before germination can occur. It will take several years before any results might be visible. The proponent, although asked, has not stated what species of plants will be used to replace vegetation removed on the Moraine and in other sections of the project area. In the interim, invasive species take hold.

Soil structure compacted by the use of heavy machinery will not be able to support strong seed germination numbers.

It is impossible to restore a 160 year old hedgerow, open country bird habitat as well as complex deciduous and coniferous woodlands employing the mitigation measures outlined by the proponent in the application for approval. Invasive plants will take hold. Since predominant winds are westerly, 'invasive' plant species will spread to the 200 acre property now under a lease agreement with the Kawartha Heritage Conservancy and then spread quickly to Fleetwood Conservation Area as well as the ANSI Fleetwood kames all located to the west of the Sumac Ridge project.

Whether the transmission line is built above or below ground, each option will require an extensive reconfiguration of the existing natural landscape and will fragment movement corridors. Significant vegetation removal will be required to make Gray Road accessible to construction vehicles. Even more vegetation including old growth trees may be necessary to accommodate an overhead transmission line.

According the MNR SWHG, "Significant wildlife habitats do not occupy discrete, isolated parts of the landscape. Often different wildlife habitats, each with different boundaries, are found in the same natural area. Each provides important ecological functions that together give the area high value. For example, a large forest stand may provide forest-interior habitat for breeding birds. It may also provide denning habitat for martens, a woodland breeding pond for amphibians, and enough undisturbed area for wide-ranging carnivores such as fishers and wolves.

Identifying the various significant wildlife habitats found at one site may determine the size and shape of the area to be protected. It would also assist in understanding the ecological functions of the site and implications of proposed activities in the area.

Ecological functions/effects of loss

“Loss of these seasonal concentration habitats results in a disproportionate loss of associated wildlife. To maintain the biodiversity of the planning area and Ontario, these critical wildlife habitats should be identified and protected.”

Destroying a natural area is antithetical to “continued rehabilitation of the natural values and long-term stewardship” as stated in the MNR SWHG. It is recommended that in order to support long-term stewardship, the transmission line be relocated, perhaps onto the lands of participating landowners. Such relocation would also address the issue of a developer planning to significantly alter municipal property without having secured permission or required permits.