



Environment Haliburton!
Haliburton, Ontario
K0M 1S0

January 18, 2023

County of Haliburton Planning Department
11 Newcastle Street
Minden, Ontario
K0M2K0

Attention: Stephen Stone, Director of Planning

Sent by email: sstone@haliburtoncounty.ca

Re: **County File No. 4624-OPA-001** - Harburn Holding Ltd.
Official Plan Amendment for Part Lots 9 & 10, Conc. 8, Parts 1-5, 19R-10423

Dear Mr. Stone:

Environment Haliburton! (EH!) would like to submit the following comments, concerns and requests in regard to the above Official Plan Amendment (O.P.A.).

We have reviewed the documentation for the above and question if all relevant information has been supplied and considered to determine if the current Official Plan Amendment conforms to the Official Plans, is consistent with Provincial Policy, is appropriate, and is good planning.

From the various reports it is confirmed that the wetlands within this property have not been evaluated under the Provincial evaluation system. The Environmental Impact Study/Wetland Site Assessment, completed by Michalski Nielsen, dated May 2021, states that the wetland assessment was undertaken by unnamed ecologists and biologists who are certified Ontario Wetland Evaluators but does not include an evaluation of the wetland under the Ontario Wetland Evaluation System (OWES). The author of the report concludes that there are no attributes to suggest the wetland would qualify as being a provincially significant wetland, but we question how this could be determined without completing an OWES? The report mentions the excellent fish habitat, the excellent wetlands wildlife habitat values and suggests that the wetland could support a rare vegetation species. The report states the evaluators delineated the boundary of the wetland in the same manner as would be done in a wetland evaluation. The report also states that the wetland boundaries mapped by an Ontario Land Surveyor, the landowner himself, are slightly different than those delineated for the report.



We also note from the Environmental Impact Study/Wetland Site Assessment and the Planning Report that both reports mention prior site clearing and site alterations, such as clearing of natural vegetation, construction of a pond, defining portions of the wetland through rock placement along portions of the edge, backfilling some of the lands behind the filled edge and clean rock fill deposited on the site. It should also be noted that the reports confirm the two drainage courses on the property, referred to as generally intermittent, but states persistent drainage through a shallow trench filled with river stone.

We are concerned with the lack of assessment, information and protection for not only the wetlands but also the stream shown on the Ministry of Natural Resources and Forestry mapping. The reports include minimal information about the stream.

We ask that the following be completed prior to the approval of this Official Plan Amendment:

1. An OWES be completed, reviewed, and approved by the Ministry of Natural Resources and Forestry, as outlined in the Natural Heritage Reference Manual, to determine the significance and boundaries of the wetland prior to the approval of this O.P.A.
2. a Site Evaluation Report
3. a Stream Assessment

We would also like to request that the County of Haliburton consider implementing a Site Alteration By-Law that would prohibit site alterations being undertaken without approval. The County of Haliburton does not have a Site Alteration By-law in place, and we are increasingly seeing sites being altered, wetlands filled in, streams diverted, etc. prior to any approvals or permits. These site alterations are negatively affecting vulnerable natural features, which are so important to our environment. We would like to see an open public discussion and consultation process on what a Site Alteration By-law should contain.

EH! is not opposed to development, and we are aware of the need for affordable housing in Haliburton, but we are also aware of the importance of protecting our environment.

We request to be notified of the decision of County Council in regard to the subject O.P.A.

Thank you,

Susan Hay, President
On behalf of EH!