

**PROPOSED 5 YEAR REVIEW FOR THE CITY OF ELLIOT LAKE OFFICIAL PLAN
Preliminary Comments on the Draft 5-Year Amendment to the Official Plan**

COMMENTS: Numbers refer to section numbers in the Draft Official Plan Amendment
 “PPS” refers to 2014 Provincial Policy Statement
 “OP” refers to “Official Plan”, DOPA refers to “Draft Official Plan Amendment”
 Note that beginning from Section 7.0 of the Draft OP, the page numbering begins again at 0.

Section/ Comment	COMMENTS OF PROVINCIAL INTERESTS & THE PROVINCIAL POLICY STATEMENT, 2014	MUNICIPAL NOTES
	General	
Comment 1.	<p>Section 1.4.1 of the PPS requires municipalities to provide for an appropriate range and mix of housing types and densities required to meet projected requirements of current and future residents of the regional market area.</p> <p>“Opening Doors to Better Lives,” the ADSAB’s 2013 Housing and Homelessness Plan highlights the need for more sustainable, market-based affordable housing, with and without supports, throughout the District. The Plan notes that providing new assisted living facilities in the service area will have the added benefit of freeing up existing housing. The lack of affordable rental stock is identified in the Plan as being a significant concern throughout the District.</p> <p>In Recommendation 2.1.5, to address specific needs identified by the ADSAB’s Housing and Homelessness planning process, the Plan indicates, “In collaboration with the City of Elliot Lake, the ADSAB will consider the feasibility of adding more bachelor and one bedroom units</p>	

	<p>and 4-5 bedroom units for larger families.” It is noted that the City of Elliot Lake’s draft OP generally provides a policy environment for new residential development which should assist in achieving these objectives. In particular, second unit policies and the contemplation of garden suites throughout residential areas in the municipality are helpful. However, we note that the City’s proposed target of 10% for new development to be affordable may be too low. This, coupled with a lack of definition of “affordable” in the context of the Elliot Lake market, may create challenges in achieving the ADSAB’s objectives (see Section 2, below).</p> <p>The ADSAB’s Housing and Homelessness Plan also indicates that there is a need for the provision of shelter services in the community – and specifically a men’s shelter (see further comments in Section 3, below).</p> <p>The ADSAB’s Housing and Homelessness Plan further indicates that there is a ‘demonstrable need’ for a youth-focused group home in Elliot Lake. There appears to be a lack of specific policies related to group homes in the draft Official Plan the policy direction of the City not to treat group homes differently from other residential land uses in plan policy is supported. This approach, coupled with generally permissive draft policies that direct most new residential development to serviced urban areas, should provide flexibility for the development of a youth-focused group home, and other group home facilities, in the future, should proposals come forward.</p>	<p>See comments on Sec. 4.6.1.</p> <p>No change required.</p>
2.	<p>The Ministry of Transportation and the Ministry of Northern Development and Mines are preparing a Northern Ontario Multimodal Transportation Strategy. The Strategy will adopt an integrated multimodal approach that considers road, rail, air and marine transport modes, and other important aspects of the transportation system. The Strategy takes into consideration climate change impacts and the natural environmental features in Northern Ontario, through integrated transportation planning, an understanding of environmental concerns. A draft Northern Ontario</p>	

	<p>Multimodal Transportation Strategy was released on July 12, 2017. It contains a vision statement, five goals, and 37 directions to guide transportation policy, program and investment opportunities, for a modern and sustainable transportation system in Northern Ontario over the next 25 years. The final strategy is expected to be released by the end of 2017. The City of Elliot Lake should consider the recommendations from the Northern Ontario Multimodal Transportation Strategy in future revisions or updates of the Official Plan and align or incorporate any actions as appropriate.</p>	<p>No change required. To be considered in future revisions of the Plan.</p>
<p>3.</p>	<p>As stated in Section 5.7.3.3 of the Official Plan and in keeping with Section 2.2 of the PPS, development of shoreline residential areas shall be consistent with the lakeshore capacity assessment model. As per the attached Summary of Water Quality Analysis, there are a number of lakes with lands designated for future shoreline residential development which are currently not appropriate for development based on water quality. The Province considers a wide variety of additional factors, in addition to water quality, before making a decision to sell land to a municipality for the purposes of waterfront development. At this time, the Province is not prepared to approve the disposition of Crown land for any of the areas depicted as Shoreline Residential - Future on Schedule B.</p> <p>However, the Province understands that the Municipality is working towards satisfying disposition requirements on a lake-by-lake basis to support their application for Phase 2 of their Waterfront Development project.</p>	<p>OP revised to remove Esten Lake. Others to remain.</p> <p>Policies have been enhanced around enhanced septic treatment for septic where TP is an issue.</p> <p>Comment added that development will be consistent with the City of Elliot Lake Act – previously approved with province and FN.</p>
<p>4.</p>	<p>Section 2.5.1 of the PPS requires the identification and long term protection of mineral aggregate resources. Section 5.7.6, Mineral Aggregates, of the draft official plan should be reworked to better align with PPS Section 2.5 Mineral Aggregate Resources and to recognize that the City of Elliot Lake is designated under the Aggregate Resources Act. The comments provided below regarding mineral aggregate resources</p>	

	<p>work to address excess information that may no longer be required in the official plan as a result of the designation. In addition, Section 2.5.1 of the PPS requires that where provincial information is available, mineral aggregate resources shall be identified. Information pertaining to Nipissing Diabase which was provided to the City as part of MNR's Resource Information Package on January 10, 2017, was not included in the draft official plan. Nipissing Diabase has numerous potential aggregate uses due to its physical properties. Nipissing diabase is often referred to as "trap rock" and, due to its excellent abrasion resistance, soundness and durability, has many applications as aggregate for asphalt paving and concrete, armour stone, riprap, rail track ballast, etc. As such, the Province recommends that deposits are identified and protected by the official plan.</p>	<p>The City does not have the resources through the Official Plan project to digitize the information on Nipissing Diabase. In addition, it should be noted that Nipissing Diabase is in areas of existing development and many waterfronts where an aggregate extraction operation would be incompatible with existing development and the environment. As such, the OP has been revised to note that mineral aggregate resource use shall have priority, except where there is existing development or near a lake or existing development.</p>
<p>Section 1.</p>	<p>INTRODUCTION</p> <p>Subsection 3(5) of the Planning Act states that the decision of the council of a municipality shall be consistent with policy statements issued under subsection 3(1), and that they shall conform with provincial plans that are in effect or shall not conflict with them. It is recommended the words "or does not conflict with" before the words "the 2011 Growth Plan for Northern Ontario" be added in in Section 1.1.2.</p> <p>Section 2.2 of the PPS requires that planning authorities protect, improve or restore the quality and quantity of water. As such, it is recommended that an objective be added to the Official Plan to ensure the protection of water is adequately addressed, particularly with regard to the protection of municipal drinking water supplies.</p> <p>Built form is a provincial interest as set out in Section 2 of the Planning Act. The Official Plan should include an objective in Section 1.1 on the promotion of built form that is well-designed, encourages a sense of place,</p>	<p>Concur. OP revised.</p> <p>Concur. OP revised.</p> <p>Concur. OP revised.</p>

	<p>and provides for public spaces that are of high quality, safe, accessible, attractive and vibrant.</p> <p>A public consultation strategy is included in the list of items required in order for a complete application (Section 8.8); however, the OP could include more detailed policies on public consultation.</p>	<p>No change required.</p>
<p>Section 2.</p>	<p>THE PLANNING ENVIRONMENT</p> <p>Section 2 of the draft Official Plan states that the planning horizon for the Official Plan is “generally” up to 20 years, but goes on to specify that there is no “terminal year” for the Plan. This approach to planning is problematic for achieving affordable housing objectives. As the PPS requires affordable housing targets, based on a definition of affordable in a regional market area, planning for affordability over an unspecified period of time may create challenges for the City in achieving affordability targets. Further, this approach appears not to be consistent with Section 1.1.2 of the PPS which states that sufficient land shall be made available to accommodate an appropriate range and mix of land uses. There may also be other policy implications beyond housing affordability which might be impacted by an indefinite planning horizon in the Official Plan.</p> <p>Further, Section 2.0 of the OP briefly talks about the Growth Plan for Northern Ontario. The OP could be more detailed about how the Plan intends to conform to the directions of the Growth Plan. It is recommended Section 2.0 be revised in this regard.</p>	<p>Concur. OP revised. Note: the draft wording was from the existing Approved OP.</p> <p>No change required.</p>
<p>Section 3.</p>	<p>BASIS OF THE PLAN</p> <p><u>p. 7 – Section 3.4 g) (Healthy Community Principles)</u></p> <p>Section 1.8.1 of the PPS requires that planning authorities support energy conservation and efficiency, improved air quality, reduced greenhouse gas</p>	

	<p>the planning horizon of the Plan, or how achievement of the target will be implemented.</p> <p>Further, Section 4.6.1 of the draft Official Plan defines “affordable” as being, “based on the definition in the PPS.” This definition is not helpful and will not assist the City of Elliot Lake in achieving its affordability target – the definition of “affordable” is not something that can be exported directly from the PPS into an Official Plan. Policies should include a definition of “affordable” based on an analysis of the City of Elliot Lake’s regional market area.</p> <p>We note that the Algoma DSAB’s 10-Year Housing and Homelessness Plan may provide some insight for the City of Elliot Lake for the determination of an appropriate regional market area, as per the PPS.</p> <p>Without a better understanding of the City of Elliot Lake in the context of its regional market area and identification of what “affordable” is within that context, we are unable to comment further on the appropriateness of the proposed 10% target for affordable housing for new development.</p> <p>To demonstrate consistency with Section 1.4.3 of the Provincial Policy Statement, 2014, draft policies must be developed based on the definition of “affordable” for ownership and rental housing, as per the direction found in the definition of “affordable” in the PPS. The City should also identify an evidence-based target based on need.</p> <p>To define what ‘affordable’ is in the context of the City of Elliot Lake, an appropriate technical evaluation, such as a Housing Needs Analysis, should be undertaken. This study will establish baseline data for Elliot Lake’s regional market area; inform the definition of ‘affordable’ in the context of the City; and recommend an evidence-based target for affordable housing based on identified need.</p>	<p>No change required. “Affordable” is defined in the PPS and will vary from year-to-year. Out of scope for City to develop a Housing Needs Analysis as part of the OP update.</p>
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	<p>Implementation and monitoring policies should also be developed with regards to monitoring and achieving the City's affordable housing target for new development. These policies could be recommended through the Housing Needs Analysis.</p> <p>We also encourage the City of Elliot Lake discuss housing needs with the ADSAB, and consider how the City can assist and support achieving the goals and housing and homelessness objectives of the ADSAB's 10-Year Housing and Homelessness Plan. It should further be noted that the ADSAB will be conducting a 5 year review of its' Housing and Homelessness Plan throughout 2018, and that would be an opportune time to demonstrate coordination and collaboration of current needs.</p> <p>We would be pleased to review a Housing Needs Analysis or similar technical study to be undertaken by the City of Elliot Lake as part of the effort to determine an evidence-based affordable housing target and policies that identify what "affordable" is for ownership and rental housing in the City within the context of the regional market.</p> <p><u>p. 19 – Section 4.6.4 (Secondary Units)</u></p> <p>Section 4.6.4 of the Official Plan permits second units in single-detached, semi-detached, or row-house dwelling units or within accessory buildings. Subsection 4.6.4(2) states that the zoning by-law shall include regulations for unit size, on-site parking and other performance standards. It should be noted that the intent of section 16(3) of the Planning Act is that the requirements for second units should not be more restrictive than the requirements for the principal dwelling unit.</p> <p><u>p. 28 – Section 4.11 (Servicing Policies for Water and Sewer)</u></p> <p>Section 2.2 of the PPS requires that planning authorities protect, improve or restore the quality and quantity of water.</p>	<p>No change required.</p>
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	<p>It is recommended Elliot Lake be identified as the source for drinking water and any concerns with this supply. This could be connected to policies that protect Elliot Lake.</p> <p><u>p. 29 – Section 4.11.1 (Urban Development)</u></p> <p>Section 1.6.6.4 of the PPS states that where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not provided, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts. It is recommended that the words “and in accordance with the MOECC D-Series guidelines” be added to the end of the second paragraph following “subject to the following”.</p> <p>Further, Section 1.6.6.5 states that development on partial services may only occur to address failed individual services in existing development or within settlement areas to allow for infilling and minor rounding out of existing development provided site conditions are suitable for the long term with no negative impact.</p> <p>Section 4.11.1 (second paragraph) seems to provide for the creation of “a limited number of lots” on partial servicing; however, the stipulation of a maximum of 3 lots in 4.11.1.6 only pertains to private servicing. It is recommended that the policy more clearly define what is considered a “minor rounding out” as it relates to development on partial services.</p> <p>Section 4.11.1.5 of the OP states “a private sewage disposal system (if required) can be accommodated on the lot; and...”.</p>	<p>Concur. OP revised to include a new Section 6.2 which provides for source water protection.</p> <p>Concur. OP revised to indicate “and in accordance with MOECC guidelines.”</p> <p>No change required.</p>
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	<p>It is recommended the policy read “A private sewage disposal system (if required) can be accommodated on the lot, provided MOECC D-series guidelines are adhered to; and...”.</p> <p>p. 29 – Section 4.11.1.6 – The policy states “not more than three lots are created on private services.” Clarification is recommended on what exactly this means i.e. per application? It is recommended the policy ensure lot creation is feasible given infrastructure and public service facilities.</p> <p><u>p. 29 – Section 4.11.2.1 (Rural Development)</u></p> <p>Section 1.6.6.4 of the PPS states that where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not provided, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts. It is recommended that the first sentence be revised as follows:</p> <p>“Lands within rural area may be serviced by on-site (private) water and sewer systems provided that the site conditions are suitable for the long-term provisions of such services with no negative impacts...”</p> <p><u>p. 30 – Section 4.11.2.2 (Rural Development)</u></p> <p>Sections 1.6.6.4 and 1.6.6.6 of the PPS require that private services must be located such that site conditions are suitable for the long term and that sufficient reserve sewage capacity is available for the treatment of septage.</p> <p>Section 4.11.2.2 of the OP implies lots of 1 ha will be exempt from terrain analysis and hydrogeological report but this should also be dependent on</p>	<p>No change required. The above suggestion already notes adherence to MOECC guidelines.</p> <p>No change required. This wording is from the existing approved OP.</p> <p>Concur. OP revised.</p>
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	<p>services available. Confirmation of available existing or planned capacity for the treatment of hauled sewage/septage will be required prior to the approval of new lots or units serviced by individual on-site sewage disposal systems.</p> <p><u>p. 30 – Section 4.11.4 (Storm Water Management), general</u></p> <p>Section 1.6.8.3 of the PPS provides for the protection of adjacent lands to existing and planned transportation corridors. It is recommended that consideration be given to post development flows of drainage that may impact provincial highways. It is recommended that the following policy be added:</p> <p>“A storm water management plan or report must be reviewed and approved by MTO for those developments located adjacent to or in the vicinity of a provincial highway, where drainage would impact a highway downstream.”</p> <p><u>p. 30 – Section 4.11.4 (Storm Water Management), bullet 3</u></p> <p>Section 2.2 of the PPS requires that planning authorities protect, improve or restore the quality and quantity of water. As such, it is recommended that the policy be revised as follows:</p> <p>“ensures that post-development run-off rates will not be greater than the pre-development run-off rates and where possible improve existing conditions that are less than ideal.”</p> <p><u>p. 33 – Section 4.13 (Wayside Pits and...)</u></p> <p>Section 2.5.5.1 of the PPS states that wayside pits and quarries, portable asphalt plants and portable concrete plants used on public authority contracts shall be permitted, without the need for an official plan</p>	<p>Concur. OP revised to add new subsection 4.11.2.3.</p> <p>Concur. OP revised.</p> <p>Concur. OP revised.</p>
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	<p>amendment, rezoning, or development permit under the Planning Act in all areas, except those areas of existing development or particular environmental sensitivity which have been determined to be incompatible with extraction and associated activities.</p> <p>It is recommended that the policy be revised to reflect section 2.5.5.1 of the PPS as it pertains to the inclusion of portable concrete plants.</p> <p><u>p. 34 – Section 4.14.3 (Adaptive Design...)</u></p> <p>Section 3.1.3 of the PPS requires that planning authorities shall consider the potential impacts of climate change that may increase the risk associated with natural hazards.</p> <p>It is recommended that a bullet be added that states “The potential for climate change to increase risks associated with natural hazards.”</p>	<p>Concur. OP revised.</p> <p>Concur. OP revised to include in the bullet on public education and awareness.</p>
Section 5.	<p>DETAILED DEVELOPMENT POLICIES</p> <p><u>p. 38 – Section 5.1 (Residential Areas in the Elliot Lake Urban Settlement Area)</u></p> <p>Section 1.1.3.8 of the PPS requires a municipality to undertake a comprehensive review for a proposed settlement boundary expansion.</p> <p>It is recommended a policy be added to this section that prohibits the expansion of a settlement area boundary unless it is supported by a comprehensive review and only where it has been demonstrated that sufficient opportunities for growth are not available through intensification, redevelopment and designated growth areas to accommodate the projected needs over the identified planning horizon; and the infrastructure and public service facilities which are planned or available are suitable for the development over the long term, are financially viable</p>	<p>Concur. OP revised as an addition to Sec. 5.1.5 Sequence of Development.</p>

	<p>over their life cycle, and protect public health and safety and the natural environment.</p> <p>See also our comments regarding Schedule 'A' with respect to the proposed addition of 186 hectares of land to the City's urban settlement area.</p> <p><u>p. 40 – Section 5.1.3.2 (Medium Density...)</u></p> <p>Section 4.6 of the PPS requires that the PPS be implemented in a manner consistent with the Ontario Human Rights Code and the Canadian Charter of Rights and Freedoms.</p> <p>For greater clarity, policy 2 of Section 5.1.3.2 should be amended where it references "group housing" so as not to imply that it is intended to be applicable to group homes.</p> <p><u>p. 42 – Section 5.1.4 (5) (Compatibility of housing...), bullet 2 & 3</u></p> <p>Section 1.2.6.1 of the PPS states that major facilities and sensitive land uses should be planned to ensure they are appropriately designed, buffered and/or separated from each other to prevent or mitigate adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term viability of major facilities. It is recommended that the words "in accordance with MOECC's minimum standards for noise" be added to the end of the sentence of bullet 2.</p> <p>Further, It is recommended that bullet 3 be revised by adding "...according to the requirements of the MOECC's D-Series Guidelines".</p> <p><u>p.45 – Section 5.2 (Parkland)</u></p>	<p>Concur. OP revised to indicate SPCA required for medium density – without listing particular built form.</p> <p>Concur. OP revised.</p> <p>Concur. OP revised to add in accordance with MOECC guidelines.</p>
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	<p>PPS 1.8.1 b) The second paragraph should ensure residential area and commercial area designations have access to parks and are connected to active transportation. It is recommended the policy state: "...designations with access to parks and are connected to active transportation.</p> <p><u>p.60 – Section 5.5.2 (Permitted Uses), third paragraph</u></p> <p>Section 1.2.6.1 of the PPS states that major facilities and sensitive land uses should be planned to ensure they are appropriately designed, buffered and/or separated from each other to prevent or mitigate adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term viability of major facilities.</p> <p>Section 5.5.2 of the PPS states that, "...Council shall establish "minimum distance separations" between classes of industry and adjacent."</p> <p>It is recommended the OP reference D-6 Series minimum distances and clarify that they only apply after a study has been completed to confirm, otherwise they must be the maximum distance.</p> <p><u>p. 64 – Section 5.7 (Rural), general</u></p> <p>Section 1.1.5.8 of the PPS states that agricultural uses, agriculture-related uses, on-farm diversified uses and normal farm practices should be promoted and protected in accordance with provincial standards.</p> <p>Section 5.7 of the OP permits a wide range of uses in the Rural area. While agriculture may not be a predominant land use in the municipality, the inclusion of policies to help promote and support other uses that may benefit agriculture is encouraged.</p> <p>It is recommended that the Rural policies be amended to also encourage on-farm diversified uses. Provisions to highlight that normal farm</p>	<p>Concur. OP revised with alternate wording: Parkland facilities and active transportation connections are also located and permitted in residential and commercial designations.</p> <p>No change required. OP revised to provide reference to Section 6.5 which provides further details.</p> <p>Concur. OP revised in Section 5.7.2.6.</p>
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	<p>practices should be promoted and protected in accordance with provincial standards would also be beneficial.</p> <p><u>p. 64 – Section 5.7.2.2 (Permitted Uses)</u></p> <p>Section 1.5.1.2 of the PPS allows for “limited residential development” in rural areas within a municipality. It is noted that “limited residential development” is specifically mentioned in paragraph 4 of Section 5.7.1 of the OP; however, Section 5.7.2.2 of the OP doesn’t specify residential uses are limited nor does it provide for a definition of what constitutes “limited residential development”. It is recommended the policy be revised accordingly. This could include a cap on the number of lots created in rural areas versus urban areas.</p> <p><u>p. 66 – Section 5.7.3 (Shoreline Residential)</u></p> <p>Further to the comment provided above, Section 5.7.3 of the OP states that the Shoreline Residential designation is intended to “provide an alternative residential living environment” and refers to a number of housing units being brought onto the market through a marketing program and based on “supply and demand”. The policy should be clearer about how residential development of shoreline designation will be “limited”. This could include a cap on the number of lots created in rural areas versus urban areas.</p> <p><u>p. 66 – Section 5.7.3.1 (Development Concept)</u></p> <p>Section 4.10 of the PPS states that a wide range of legislation, regulations, policies, and plans may apply to decisions with respect to Planning Act applications. In some cases, a Planning Act proposal may also require approval under other legislation or regulation, and policies and plans issued under other legislation may also apply.</p>	<p>Concur. OP revised at the end of Section 5.7.1.</p> <p>Concur. OP revised to note that these are recreational dwellings</p>
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	<p>It is noted on Schedules A and B that there are a number of locations designated as “Shoreline Residential – Future.” The majority of these areas occur on Crown land. It is recommended that the following statements be added into Section 5.7.3.1 Development Concept to specifically recognize that not all areas identified for “Shoreline Residential-Future” are currently appropriate for development and that many of the areas proposed for future development are located on Crown land:</p> <p>“A number of the areas designated as Shoreline Residential - Future on Schedules A and B occur on Crown land. The Province maintains the approval authority to determine if Crown land will be disposed for the purposes of supporting municipal economic development. The designation of an area as “Shoreline Development – Future” on Schedule B does not reflect a decision on the part of the Province to dispose of land for the purposes of future Shoreline Residential development, nor does it constitute an assessment by the Province that the location is appropriate for future waterfront development.”</p> <p>Alternatively, the City could consider the removal of the designation from the Schedules.</p> <p><u>p. 66/67 – Section 5.7.3.3/5.7.3.5 (Lake Development/Form of Development)</u></p> <p>Section 1.1.1 c) states that healthy, liveable and safe communities are sustained by avoiding development and land use patterns which may cause environmental or public health and safety concerns. Section 2.2.1 g) of the PPS states that planning authorities shall protect, improve or restore the quantity and quality of water by ensuring consideration of environmental lake capacity, where applicable.</p>	<p>Concur. OP revised to include some of the recommended wording. The City would like to show their intent for future shoreline development by including areas on the schedules.</p>
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<p>In the event that Lake Management Plans mentioned in Section 5.7.3.3 and 5.7.3.5 of the draft official plan include lake capacity calculations, those may be outdated if they were not done using most recent model coefficients and guidance of the Lakeshore Capacity Assessment Handbook (May 2010). It is recommended references be made to The Lakeshore Capacity Assessment Handbook.</p> <p><u>p. 66 – Section 5.7.3.3 (Lake Development)</u></p> <p>Lake capacity assessments include all development, whether permanent or seasonal, residential or non-residential. In order to be consistent with PPS 1.1.1 c) and 2.2.1 g), it is recommended that the policy be revised to include all development types.</p> <p>The OP should indicate that lake capacity modelling includes development to at least 300 m distance from lake shorelines and permanently-flowing tributary streams.</p> <p>The OP has not clearly stated a watershed approach. For example, what will be the policies for development on lakes upstream of at-capacity lakes?</p> <p>It is not clear what OP policies will apply when a lake is at capacity. The Lakeshore Capacity Assessment Handbook (May 2010) provides recommendations for development on lakes at capacity.</p> <p><u>p. 67 – Section 5.7.3.4 (Municipal Services)</u></p> <p>Section 1.1.5.5 of the PPS requires that development be appropriate to the infrastructure which is planned or available and avoid the need for the unjustified and/or uneconomical expansion of infrastructure. Section 1.6.7.2 of the PPS requires that efficient use be made of existing and planned infrastructure.</p>	<p>No change required. Already referenced in S. 5.7.3.3.</p> <p>Concur. OP revised to add a section on Lakes at Capacity. It should be noted that there is a very different development scenario in Elliot Lake with almost no private waterfront property until after the City has gone through the rigorous Crown Land disposition process.</p>
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	<p>It is recommended more detailed policies be added for water access only lots to ensure shoreline access facilities are planned properly (e.g., use of vegetative buffers, ensuring that vehicle parking is set back appropriately, how access will be guaranteed to water access only property owners, etc.).</p> <p>These policies could include requiring direct deeded access to mainland parking and dockage with direct access to a public road and/or existing right-of-way.</p> <p><u>p. 68 – Section 5.7.3.6 (Environmental Design Principles)</u></p> <p>In order to be consistent with PPS 1.1.1 e) and 2.2.1 g) (as described above), it is recommended a statement be included to identify who will monitor lake capacity to assess the impact of development. Specifically, what monitoring is proposed, what actions will follow if water quality exceeds Provincial Water Quality Objectives or it is shown that deterioration of water quality is occurring.</p> <p>It is recommended that the City include some of the excellent design concepts (e.g., storm water management, re-vegetation, pervious surfaces) within OP Policy 4.14.3 Adaptive Design for Climate Change to shoreline development as well as the need for mitigation techniques (e.g. erosion and sediment controls) during construction. Monitoring to confirm storm water mitigation in place during construction phase is recommended.</p> <p><u>p. 68 – Section 5.7.3.7 (Site Plan Control...)</u></p> <p>Section 2.2.1 of the PPS requires planning authorities to protect, improve or restore the quality and quantity of water.</p>	<p>Concur. OP revised.</p> <p>No change required. The City is the developer and does not have the capacity to undertake lake studies after development has occurred. The City has already undergone extensive studies approved by the Province to permit shoreline development.</p> <p>Concur. OP revised to include as a consideration not a shall.</p>
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	<p>This policy reads as though incomplete. Further, it is recommended that “may use” be revised to “will use” to provide clearer direction for the protection of shoreline vegetation for the benefit of water quality and the second paragraph be revised as follows:</p> <p>“Natural vegetation shall not be disturbed within 30 m of the shoreline or more in areas with steep slopes.”</p> <p>It is recommended policies for environmental protection should also apply to re-development. A goal for re-development should be to at least maintain and to improve upon existing situation, for example increasing setback distances where possible and restoring natural vegetation.</p> <p><u>p. 70 – Section 5.7.5.2 b) (Mineral Resources as a Constraint)</u></p> <p>Section 1.2.6.1 of the PPS states that major facilities and sensitive land uses should be planned to ensure they are appropriately designed, buffered and/or separated from each other to prevent or mitigate adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term viability of major facilities. It is recommended that the policy address land use compatibility between conflicting uses in accordance with the influence area and separation distances in the MOECC D-Series Guidelines.</p> <p><u>p. 71 – Section 5.7.5 (Mineral Resources)</u></p> <p>Section 4.10 of the PPS states that a wide range of legislation, regulations, policies, and plans may apply to decisions with respect to Planning Act applications. In some cases, a Planning Act proposal may also require approval under other legislation or regulation, and policies and plans issued under other legislation may also apply.</p>	<p>No change required. The City’s Zoning By-law contains extensive requirements for shoreline development.</p> <p>Concur. OP revised.</p> <p>Concur. OP revised.</p>
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	<p>Further, it is recommended that “Rehabilitation” be given its own sub-section. As such, it is recommended that the second paragraph removed and replaced with the relevant PPS policies (2.5.3.1 and 2.5.3.2).</p> <p><u>p. 73 – Section 5.7.6.1 (Permitted Uses)</u></p> <p>General - Section 2.5.2.4 of the PPS requires that mineral aggregate operations shall be protected from development and activities that would preclude or hinder their expansion or continued use or which would be incompatible for reasons of public health, public safety or environmental impact. Existing mineral aggregate operations shall be permitted to continue without the need for official plan amendment, rezoning or development permit under the Planning Act. When a license for extraction or operation ceases to exist, policy 2.5.2.5 continues to apply.</p> <p>It is recommended that the permitted uses section be revised for consistency with Section 2.5.2.4 of the PPS by permitting only uses that protect aggregate operations from development which would hinder their expansion.</p> <p>Regarding paragraph 1 and subsequent bullet list. Section 2.5.2.2 of the PPS states that extraction shall be undertaken in a manner which minimizes social, economic and environmental impacts. Passive recreation within aggregate sites is not encouraged. Therefore it is recommended the fifth bulled be removed.</p> <p>Section 4.10 of the PPS states that a wide range of legislation, regulations, policies and plans may apply to decisions with respect to Planning Act applications. Also regarding paragraph 1, the fourth bullet should be revised to include concrete plants in the list of associated uses in order to allow this activity to be more easily approved under the Aggregate Resources Act.</p>	<p>Concur. OP revised.</p> <p>Concur. OP revised.</p>
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	<p>Regarding paragraph 2 and subsequent bullet list. Section 2.5.2.5 of the PPS states that in known deposits of mineral aggregate resources and on adjacent lands, development and activities which would preclude or hinder the establishment of new operations or access to the resources shall only be permitted if:</p> <p>a. resource use would not be feasible; or b. the proposed land use or development serves a greater long-term public interest; and c. issues of public health, public safety and environmental impact are addressed.</p> <p>The policy should be revised to be consistent with the PPS.</p> <p><u>p. 73 – Section 5.7.6.2 (Setbacks)</u></p> <p>Section 1.2.6.1 of the PPS states that major facilities and sensitive land uses should be planned to ensure they are appropriately designed, buffered and/or separated from each other to prevent or mitigate adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term viability of major facilities.</p> <p>It is stated in this section that pits 150m above the water table are within the influence area. This is incorrect, as 300m is the minimum separation distance for a Class III industrial use as set out in the Ministry of the Environment and Climate Change’s Guideline D-6. It is recommended the policy be revised to state that pits and quarries are considered Class III Industrial uses as per the D-6 Guideline, with an influence area of 1,000 metres unless studies in accordance with the Guideline are undertaken to determine the actual influence area.</p> <p><u>p. 75 – Section 5.7.6.4 (Adjacent Lands)</u></p>	<p>Concur. OP revised.</p> <p>Concur that influence area for quarries will be revised to 1,000 m. However, varied influence areas have been approved in several other recent OPs:</p> <p>NEMI, 2016 approval: In the absence of detailed studies the minimum influence area is generally:</p> <ul style="list-style-type: none"> • Pits above the water table: 150 metres; • Pits below the water table: 300 metres; and • Quarries: 500 1000¹⁵ metres <p>SRF, 2015 approval: Where supported by appropriate technical studies, a separation distance from an aggregate operation to a sensitive land use lesser than the identified influence area may be permitted, however the minimum required separation distance shall be no less than:</p> <ul style="list-style-type: none"> • 300 metres from a pit; or • 500 metres from a quarry
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	<p>To be consistent with the PPS it is recommended that this policy be replaced with Section 2.5.2.5 of the PPS.</p> <p><u>Sections 5.7.6.1, 5.7.6.2 and 5.7.6.4</u></p> <p>Section 1.2.6.1 of the PPS states that major facilities and sensitive land uses should be planned to ensure they are appropriately designed, buffered and/or separated from each other to prevent or mitigate adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term viability of major facilities. It is recommended that the policies include references to the appropriate D series guideline.</p>	<p>Concur. OP revised.</p> <p>No change required, reference provided with specific setbacks to pits/quarries, as per above comment.</p>
Section 6.	<p>CULTURAL HERITAGE, NATURAL ENVIRONMENT, PUBLIC HEALTH & SAFETY</p> <p><u>Section 6.0 (Cultural Heritage, Natural Environment, Public Health & Safety), general</u></p> <p>Section 2.1.9 of the PPS states that nothing in policy 2.1 (Natural Heritage) is intended to limit the ability of <i>agricultural uses</i> to continue.</p> <p>It appears the Official Plan does not include provisions that speak to the treatment of agricultural uses as it relates to natural heritage features. It is recommended that the Official Plan include policies that address Section 2.1.9 of the PPS in an appropriate section or subsection of the OP.</p> <p><u>p. 83 – Section 6.1.1.1 (Cultural Heritage Resources)</u></p> <p>Section 2.6.1 of the PPS requires that significant built heritage resources and significant cultural heritage landscapes be conserved. The City should consider utilizing the term “conserve” as it includes the full range of options for the protection of cultural heritage resources and ensures</p>	<p>Concur. OP revised in Section 6.3.</p> <p>Concur. OP revised.</p>

<p>conformity with PPS terminology. Also consider updating the definition of “conserved” in the OP to be consistent with the PPS definition. The term “identification” may remain.</p> <p><u>p. 83 – Section 6.1.1.3 (Cultural Heritage Resources)</u></p> <p>Section 2.6.4 of the PPS states that, “Planning authorities should consider and promote archaeological management plans and cultural plans in conserving cultural heritage and archaeological resources”. It is recommended that the OP contain the following policy:</p> <p>“Council may undertake a Cultural Heritage Management Plan which includes but not limited to:</p> <ul style="list-style-type: none"> • comprehensive cultural heritage resource mapping, archaeological potential mapping, and inventories; • identification & evaluation of cultural heritage resources, cultural facilities, and organizations; • strategies for conserving and enhancing these identified resources; • programs to foster interpretation and promotion; • education and public participation in cultural heritage conservation.” <p><u>p. 85 – Section 6.1.3.1 (Marine Heritage Resources)</u></p> <p>Section 2.6.2 of the PPS requires that development and site alteration not be permitted on lands containing archaeological resources. Archaeological resources include marine archaeological sites. It is recommended that this policy be enhance to read:</p> <p>“Council shall require a marine archaeological assessment to be conducted by a licensed marine archaeologist pursuant to the Ontario Heritage Act if partially or fully submerged marine features such as ships, boats, vessels, artefacts from the contents of boats, old piers, docks,</p>	<p>No change required. No terms are defined in the OP.</p> <p>No change required.</p> <p>No change required.</p>
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	<p>wharfs, fords, fishing traps, dwellings, aircraft and other items of cultural heritage value or interest are identified and impacted by shoreline and waterfront developments. Archaeological assessment reports prepared by licensed consultant archaeologists are to be in compliance with the 2011 Standards and Guidelines for Consultant Archaeologists as set out by the Ministry of Tourism, Culture and Sport, as well as the terms and conditions of an archaeological licence under the <i>Ontario Heritage Act</i>.”</p> <p><u>p. 83 & 84 – Section 6.1.1 (Cultural Heritage Resources), general</u></p> <p>Section 2.6.3 of the PPS requires that planning authorities not permit development and site alteration on adjacent lands to protected heritage property except where the proposed development or site alteration has been evaluated and it has been determined that that the heritage attributes will be conserved. As such, it is recommended that following policy be included in the OP:</p> <p>“Council shall not permit development and site alteration on adjacent lands to protected heritage property except where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the protected heritage property will be conserved.”</p> <p><u>p. 86 – Section 6.2 (Natural Heritage Features)</u></p> <p>The second sentence states “a preliminary ecological site assessment will be required for development in or adjacent to natural heritage features.” It is noted that the Municipality’s process identified in section 6.5 of the OP is that an ESA is the first step in a two-step process (the second being a full environmental impact assessment). Both steps should be referenced in this policy to be consistent with Section 2.1 of the PPS.</p> <p><u>p. 86 – Section 6.2 (Natural Heritage Features), paragraph 2</u></p>	<p>Concur. OP Revised.</p> <p>Concur. OP revised.</p>
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“MNRF has identified lake trout lakes and their drainage basins as a special fisheries resource to be considered when making land use planning decisions. MNRF maintains a formal list of lakes designated for lake trout management. A lake trout lake may be determined to be at capacity for shoreline development if modelling indicates that development will cause the oxygen level to fall below MNRF’s criterion”.

Further, the it is recommended the following be included in the new subsection:

- Mention “Lake trout lakes have been identified on Schedule C.”
- A specific policy stating that: “Development and site alternation will not be permitted on lake trout lakes determined to be at capacity.”
- A specific policy stating that: “Development and site alternation will not be permitted on lake trout lakes nearing capacity until the capacity status of the lake has been confirmed.”
- A specific policy directing that a water quality study will be required as part of a complete application prior to approval of any development or site alternation on a lake trout lake, where information on the capacity of the lake does not exist.
- Lake trout lakes which are at capacity, nearing capacity and connected to lakes which are at capacity should also be included in this section. For instance;
 - “Lakes at Capacity:
 - Esten – development is not permitted
 - “Lakes Nearing Capacity:
 - “McCarthy Lake – additional information required to determine capacity status. Development not permitted until capacity status is determined.

Concur. OP revised.

Concur. OP revised.

- o “Lakes connected to lakes at or nearing capacity:
 - Pecors

Development could potentially affect dissolved oxygen on lakes nearing capacity. Development is not permitted until capacity status of upstream lake is determined.”

p. 87 – Section 6.2.3 (2) (Fish Habitat)

Section 2.2.1 of the PPS speaks to restoring the quality and quantity of water by identifying water resource systems consisting of groundwater features, hydrologic functions, natural heritage features and areas and surface water features such as shorelines which are necessary for the ecological and hydrological integrity of the watershed; maintaining linkages and related functions among ground water features, hydrologic functions, natural heritage features and areas and surface water features including shoreline areas.

Section 6.3.3 (2) of the OP allows for a decrease in the 30 m setback from fish habitat if it can be demonstrated there is net gain of productive capacity. It is not clear how a reduction in setback could enhance environmental benefits. Further, a reduced setback is inconsistent with the provincial recommendation for a 30 m natural vegetated buffer strip along lake and stream shorelines. It is recommended this exception be removed.

p. 87 – Section 6.2.4 (ANSI's)

Section 2.1.5 e) of the PPS states that development and site alteration shall not be permitted within ANSI's unless it has been demonstrated that there will be no negative impacts on the ANSI or its ecological function.

No change required. Reduction only permitted via study, not as of right.

p. 90 – Section 6.3.1.2 (Wildland Fire)

Section 3.1.8 of the PPS requires that development shall generally be directed to areas outside of lands that are unsafe for development due to the presence of hazardous forest types for wildland fire. Development may however be permitted in lands with hazardous forest types for wildland fire where the risk is mitigated in accordance with wildland fire assessment and mitigation standards.

This policy needs to be considered in the review of all applications made under the Planning Act. As the City of Elliot Lake has not undertaken a municipal wide wildland fire assessment, site review should occur for every application. It is recommended the following change be made to the second paragraph of 6.3.1.2:

“In the absence of detailed municipal assessments, proponents submitting a planning application shall be required to undertake a site review to assess the presence...”

Further, the last paragraph only addresses ‘significant wildlife habitat’ and does not address natural heritage features or areas. It is recommended the last paragraph be revised to include all natural heritage features identified in PPS 2.1 as follows:

“Wildland fire mitigation measures which would result in negative impacts on natural heritage features are not permitted, except where the “no negative impacts” test applies and it has been demonstrated that there will be no negative impact on the feature or its ecological function. If there are no mitigation measures that would avoid negative impacts on the feature or its ecological functions, development on the subject lands should not be permitted. Mitigation measure should not be permitted in habitat of endangered or threatened species or fish habitat, except in accordance with provincial and federal requirements.”

No change required. Should not be required to do a detailed assessment for all planning applications.

Keep as may.

Concur. OP revised.

influence area is 1000 m unless a study justifies a smaller influence area). It is recommended that the policy set out the different classes of industrial uses and the appropriate influence areas and setbacks.

p. 94 – Section 6.4.2 (Land Use Compatibility)

In addition to above noted relevant sections of the PPS as they pertain to public health and safety, Section 1.6.9 of the PPS further states that airports shall be protected from incompatible land uses and development by prohibiting new residential development and other sensitive land uses in areas near airports above 30 NEF/NEP, considering redevelopment of existing residential uses and other sensitive land uses, or infilling of residential and other sensitive land uses in areas above 30 NEF/NEP only if it has been demonstrated that there will be no negative impacts on the long-term function of the airport and discouraging land uses which may cause a potential aviation safety hazard.

Section 6.4.2 of the OP states that in the absence of established NEF contours around the airport, the development proponent will be responsible for undertaking the necessary study or other means to satisfy the requirements of this policy.

It is recommended policies be added that require proponents of development of sensitive land uses within 1 km of the airport runway to undertake detailed noise and other technical studies if necessary, to identify any potential adverse effects and public health and safety concerns. Completion of these studies to the satisfaction of Council should be required prior to the granting of planning approvals allowing for the development of residential or other sensitive uses within 1km of the airport runway.

p. 95 – Section 6.4.3 (Minimum Distance Separation for Agricultural Uses), title

Concur. OP revised.

	<p>Section 1.1.5.9 of the PPS requires that new land uses including the creation of lots and new or expanding livestock facilities shall comply with the minimum distance separation formulae.</p> <p>While the MDS Formula applies to agricultural operations, MDS may be applicable to a number of other forms of development, such as residential and other non-agricultural uses.</p> <p>It is recommended that the title be tweaked to remove potential confusion about the intended implementation of MDS. An option could be to delete “agricultural uses”.</p> <p><u>p. 95 – Section 6.4.3 (Minimum Distance Separation for Agricultural Uses), general</u></p> <p>Further to the PPS policy referenced above, it is encouraging to see the inclusion of an MDS provision in the Official Plan, however as per the guidance in the Province’s MDS Implementation Guidelines, specific policy direction should be taken for scenarios where options/flexibility exist, otherwise the default position in the MDS Implementation guidelines would apply.</p> <p>As currently written, the Province views the policy to require consents of surplus dwellings to meet calculated setbacks to all livestock facilities reasonably expected to be impacted. Additionally, the Province views the policy as currently written to require agriculture-related and on-farm diversified uses to meet calculated MDS setbacks to all livestock facilities reasonably expected to be impacted.</p> <p>The policy further indicates that direction for some scenarios will be established in the Zoning bylaw. The Province is not opposed to this;</p>	<p>Concur. OP revised.</p> <p>No change required. There are no prime agricultural lands, nor any agricultural land uses in the City. Section 8 of the MDS Guidelines (publication 853). Indicates: “Implementation Guidelines #7, #9, #35 and #38 address areas where municipalities have options when</p>
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	<p>however, proposals that require planning approvals should have the municipal direction clearly articulated in the Official Plan.</p> <p>It is recommended that specific policies be included to address MDS scenarios related to Guidelines # 9 and #35.</p> <p>Further information related to municipal options where flexibility exists can be found in Section 8 of the MDS Guidelines (publication 853).</p> <p><u>p. 95 – Section 6.5.1 (Environmental Assessment)</u></p> <p>It is understood that this policy is meant to avoid duplication. However, as currently written it could be interpreted that the requirements under the Environmental Assessment Act supersede those of the Planning Act when in fact requirements of both Acts must be met. it is recommended that the wording be strengthened to align with the second paragraph of Section 4.11 of the PPS which states:</p> <p>“There may be circumstances where land use approvals under the Planning Act may be integrated with approvals under other legislation, for example, integrating the planning processes and approvals under the Environmental Assessment Act and the Planning Act, provided the intent and requirements of both Acts are met.”</p>	<p>implementing MDS locally, and shall be clearly addressed by a municipality in the appropriate implementing land use planning document (e.g., official plan or comprehensive zoning by-law).” The OP indicates this will be in the ZBL.</p> <p>Concur. OP revised.</p>
Section 7.	<p>TRANSPORTATION</p> <p><u>p. 0 – Section 7.1.1.1 (Provincial Highways), general</u></p> <p>Section 1.6.8.3 of the PPS provides for the protection of adjacent lands to existing and planned transportation corridors.</p> <p>It is recognized that Section 7.1.1.1 of the OP speaks to direct access restrictions on provincial highways and the Ministry of Transportation’s</p>	

	<p>(MTO) permit control area; however, it is recommended that the policy be reworded as follows:</p> <p><i>“In addition to all the applicable municipal requirements, all proposed development located adjacent to and in the vicinity of a provincial highway within the Ministry of Transportation’s (MTO) permit control area under the Public Transportation and Highway Improvement Act (PTHIA) will also be subject to MTO approval. Early consultation with the MTO is encouraged to ensure the integration of municipal planning initiatives with provincial transportation planning. Any new areas in the municipality identified for future development that are located adjacent to or in the vicinity of a provincial highway or interchange/intersection within MTO’s permit control area will be subject to MTO’s policies, standards and requirements. Direct access will be discouraged and often prohibited.”</i></p> <p>Further it is recommended that a policy be included to encourage development on local roads and service roads wherever possible.</p> <p>Subdivision layouts where a local road runs parallel to a provincial highway, with no lots between the local road and provincial highway, often restrict the province from effectively acquiring land for future highway improvements. Ideally, rear yards should back onto a provincial highway. It is recommended that the following policy be added:</p> <p><i>“Where a draft plan of subdivision is proposed adjacent to a provincial highway, the layout of the subdivision should be designed such that the lots back onto the provincial highway and front onto a local internal street.”</i></p> <p>There is no reference to home occupations, home industries or businesses with respect to direct highway access. It is recommended that the following policy be added:</p>	<p>Concur. OP revised.</p> <p>Concur. OP revised.</p> <p>Concur. OP revised.</p>
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	<p><u>p. 5 – Section 7.7.3 (Active, Recreational Transportation and Complete Streets)</u></p> <p>MTO has restrictions on trails crossing or running along an MTO right-of-way. It is recommended that the policy be reworded as follows:</p> <p><i>“Trail crossings of a Provincial highway will require the prior approval of MTO. Crossings may be permitted subject to restrictions. Trails running along the MTO right-of-way will not be permitted.”</i></p> <p>Further, MTO reviews cycling proposals on a case by case basis and will allow changes to take place on provincial highway structure only after an analysis of the impact on safety and traffic operations. As such, it is recommended that the following policy be added within this section of the OP:</p> <p><i>“Cycle routes will only be permitted on Provincial highways after an analysis of the impact on safety and traffic operations has been reviewed and approved by MTO.”</i></p>	<p>Concur. OP revised.</p> <p>No change required. This is a separate provincial approval process that does not need to be outlined in the OP.</p>
<p>Section 8.</p>	<p>IMPLEMENTATION</p> <p><u>p. 12 – Section 8.13 (Land Division...)</u></p> <p>Section 2.1.1 of the PPS requires the protection of natural features and areas for the long term. The MNRF only maintains records of known Natural Heritage Features. The second paragraph, after the bullets, leaves the impression that all Natural Heritage Features have been accounted for. In the absence of identified Natural Heritage features an ecological site assessment should be required to determine where potential features may occur. Following the second paragraph, it is recommended the following statement be inserted:</p>	

	<p>“In the absence of identified Natural Heritage features an ecological site assessment will be conducted to determine if Natural Heritage features exist within the area.”</p> <p>p. 14 – Section 8.13.2 (Consents)</p> <p>It is recommended a bullet be added to consider lake capacity for the protection of water quality as required by Section 2.2 of the PPS.</p>	<p>OP revised with alternate wording.</p> <p>Concur. OP revised.</p>
Section 9.	<p>INTERPRETATION</p> <p>No Comments.</p>	
<p>COMMENTS ON GENERAL PLANNING PRINCIPLES</p>		
	<p>Introduction</p> <p>Section 1.0, paragraph 3 states that “The City is responsible for management of these resources and ensuring the remediation of past producing mines and tailings areas.”</p> <p>Responsibility for remediation is quite complex and rests with a number of federal and provincial authorities. The following wording change is suggested:</p> <p>“The City shares in the responsibility for the management of these resources and ensuring the remediation of past producing mines and tailings area and future mine sites.”</p> <p>Cultural Heritage Polices</p>	<p>No change required.</p>

	<p>We recommend that consideration be given to enhancing the following policies to ensure that the policies in the official plan are applicable to the broadest range of cultural heritage resources.</p> <p><u>6.1.1.2 (Bullet 2) – Separate designation powers into its own policy and expand</u></p> <p>Suggested wording: “Pursuant to the <i>Ontario Heritage Act</i>, and in consultation with the MHC, Council may, by by-law:</p> <ol style="list-style-type: none"> 1. designate properties to be of cultural heritage value or interest 2. define the municipality, or any area or areas within the municipality as an area to be examined for designation as a heritage conservation district; and 3. designate the municipality, or any area or areas within the municipality, as a heritage conservation district.” <p><u>6.1.1.2 (Bullet 2) – Separate heritage conservation districts and cultural heritage landscapes into its own policy and expand.</u></p> <p>Suggested wording: “Council may designate, under the <i>Ontario Heritage Act</i>, one or more heritage conservation districts within the municipality. Significant cultural heritage landscape features and heritage attributes may be included within a heritage conservation district. Prior to the designation of a heritage conservation district(s), Council:</p> <ol style="list-style-type: none"> 1. must have provisions and policies in an official plan pertaining to the establishment of heritage conservation districts; 2. should pass a by-law defining an area or areas to be examined for future designation as a heritage conservation district(s); 	<p>No change required to address MTCS enhancement comments.</p>
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3. should prepare a study for the area or areas to determine the feasibility of designation, the delineation of the district boundaries, an evaluation of the area's heritage character, and guidelines for future conservation and planning.

In addition, the study should be prepared in accordance with the Ministry of Tourism, Culture and Sport's Heritage Conservation District Guidelines. Public participation should be encouraged in the preparation of the study. The study can include policies to direct Council in the approval of permit applications for new development and alterations to properties located within the Heritage Conservation District.”

6.1.2 – Expand on Policy

Suggested wording: “Council recognizes that there may be archaeological sites or areas of archaeological potential within the boundaries of the municipality. Council or the Municipality will obtain available archaeological site data locations from the Ontario Archaeological Sites Database maintained by the Ministry of Tourism, Culture and Sport under the provisions of a municipal-provincial data sharing agreement, for the purpose of heritage conservation planning.”

New Policy – Heritage Impact Assessments

Suggested wording: “Council will require a heritage impact assessment to be conducted by a qualified professional whenever a development has the potential to affect a protected heritage property/ cultural heritage resource.”

New Policy – Accessibility and Heritage Conservation

Suggested wording: “In attaining its goal for establishing a barrier-free environment, Council shall encourage access solutions in a manner that

	<p>respects the cultural heritage value or interest of a protected property. Council recognises that standardised designs may not always suffice and that each heritage property will require unique accessibility plans to ensure that alterations do not adversely affect the heritage attributes.”</p> <p>Affordable Housing Policies</p> <p>The ADSAB’s Housing and Homelessness Plan identifies a need for shelter services in the City of Elliot Lake. With that in mind, the Official Plan could provide direction on the development of shelters in the community. We would encourage the City to engage and/or consult further with the ADSAB about the identified needs for shelters in the City, prior to policy development.</p> <p>The City of Elliot Lake may wish to consider the inclusion of Official Plan policies based on some of the ideas contained in the handbook prepared by the Ministry of Municipal Affairs and Housing, “Municipal Tools for Affordable Housing”. The Handbook provides several examples of tools which can be used to achieve affordable housing goals. Some of these tools are already contemplated in the draft Official Plan to achieve other objectives (such as height and density exchanges or the use of surplus municipal lands for economic development), and could be easily adapted to support the creation of affordable housing. These tools include:</p> <ul style="list-style-type: none"> • reduction of parkland dedication or cash-in-lieu requirements • reduction and/or waiving of application fees • reduction of parking requirements <p>This handbook is available online at the following URL: http://www.mah.gov.on.ca/AssetFactory.aspx?did=9270</p> <p>The Ministry has also recently produced a “Municipal Guide for Facilitating Affordable Housing, 2017,” which includes ideas and case study initiatives to prompt discussions around how municipalities might go about</p>	<p>Out of scope for OP update project to further engage/consult at this stage.</p> <p>City has included policies on affordable housing and use of a CIP to encourage this.</p>
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<p>developing affordable housing. This guide is available at the following URL: http://www.mah.gov.on.ca/Page16567.aspx</p> <p>The City of Elliot Lake might be interested in the stories identified below pertaining to Leading Practices for the City’s consideration in the development of Official Plan policies related to affordable housing:</p> <ul style="list-style-type: none"> • “Promotion of Provincial policies tools to encourage affordable housing” – use of surplus lands, City of Burlington. • “Planning Act Tools for Affordable Housing” - City of Sault Ste. Marie Rental Housing CIP • “General Power to Make Grants and Reduction/Exemption from Parking”, Riverview Terrace, Municipality of Chatham-Kent. <p>Transportation Policies</p> <p>It is noted that there are no general transportation policies in the draft Official Plan Update related to supporting goods movement, specifically within Section 7 'Transportation.' The City of Elliot Lake may want to consider including a sub- section with overarching policies that addresses supporting an integrated and efficient transportation network for goods movement.</p> <p>To further strengthen goods movement policies, the City may consider utilizing MTO's Freight-Supportive Guidelines as a resource to develop criteria for evaluating land-use plans from a goods movement perspective.</p> <p>Policy-Specific Comments</p> <p>The City may wish to consider policies that promote the use of other municipal and financial tools to support affordable housing, such as the waiving of Planning Act application fees, and the rebate of charges and property taxes through grants.</p>	<p>No change required. Highway and airport provide only goods movement.</p> <p>Same as earlier comment in this section.</p>
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	<p>p. 16 – Section 4.5 (4) – We commend the City on the policies related to climate change. To further enhance this section it is recommended that subsection 4 be reworded as follows:</p> <p>“Mixed land use developments with employment, education, recreation, shopping opportunities, and other services should be within easy access of residential areas, minimizing travel distances and increasing opportunities for pedestrian and bicycle access, thereby lessening climate change impacts. Concentrated, mixed use development in the Central Commercial Area of the urban area is, therefore, encouraged.”</p> <p>p. 16 – Section 4.5 (7) –To further enhance this section it is recommended that subsection 4 be reworded as follows:</p> <p>“In the design of residential, commercial and industrial subdivisions, Council shall encourage street layouts and the siting of buildings that provide for passive solar (gain) features, with particular regard for solar access on winter days for all solar collector panels and south-facing glass on existing and proposed buildings; in order to address climate change impacts.”</p> <p>p. 17 – Section 4.5.11 – Site Plan Control can be used to address energy conservation. It is recommended the policy be expanded to include this.</p> <p>p. 18 – Section 4.6.2 – Section 4.6.2 of the draft Official Plan indicates that garden suites are to be considered on a site specific basis, subject to a proponent substantiating a need for a garden suite. To achieve greater housing affordability, the City may wish to consider policy that permits garden suites as of right, unless certain development constraints are present on the site.</p>	<p>Concur. OP revised.</p> <p>Concur. OP revised.</p> <p>OP revised to clearly state permitted locations, maintaining requirement for temporary use by-law.</p>
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	<p>p. 30 – Section 4.11.4 – The policy states “..shall be implemented to ensure that increased runoff does not reach lakes. Remedial drainage work will be designed so that such work will not negatively affect adjacent lands..”. Please provide some details/specifics to this statement.</p> <p>p. 34 – Section 4.14.3 – To further enhance this section the City may wish to add the following to the fourth bullet: “and established developments , where possible, and to connect these areas to new and existing greenspace.”</p> <p>p. 57 – Section 5.3.3.1 – It is recommended that the words “directly serving the immediate neighbourhood” be inserted after the words “small-scale commercial uses”.</p> <p>p. 6 – Section 5.5.5 – Fourth point states “...serviced in accordance with the policies of this Plan. Servicing options may include...” please clarify the dry uses from policy 5.5.1?</p> <p>p. 66 – Section 5.7.3 – This section references Lake Management Plans as the mechanism to identify the capacity status of lakes proposed for development. Lake Management Plans was the title of the plans development for Phase 1. The lake specific plans being development for Phase 2 are referred to as Waterfront Development Plans and, this could change overtime as government regulations and policies change. As such, it is recommended that all references to “Lake Management Plans” be removed and replaced with “lake specific plans”. The first time that “lake specific plans” is used the following information could also be put in parenthesis after it (e.g., Lake Management Plans, Waterfront Development Plans, etc.) to provide the OP uses with an appropriate context for what a lake specific plan is.</p> <p>p. 72 – Section 5.7.5.5 – This policy seems only to focus on a portion of the regulatory requirements. Possibly focusing on those lands governed</p>	<p>No change required.</p> <p>No change required.</p> <p>No change required.</p> <p>No change required.</p> <p>Concur. OP revised.</p>
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	<p>through the federal Canadian Nuclear Safety Commission (CNSC) licensing requirements associated with uranium. Not to diminish this requirement it might be better to think more broadly. It is recommended the policy be revised as follows:</p> <p>“It shall be a policy that past producing mining operations or active mining operations shall be subject to the provisions of the Mining Act and all other applicable federal and provincial statutes and regulations with respect to their rehabilitation and/or closure.”</p> <p>p. 76 – Section 5.7.9 – It is noted that section 5.7.9 of the OP touches on some of the uses that may be considered agriculture-related, however it should be considered that agriculture-related uses could also include agriculture-related industrial uses.</p> <p>p. 81 – Section 5.8 – Crown Land is administered by or on behalf of the Province of Ontario by a number of Provincial Ministries, not just specifically MNR. It is recommended that the policy be revised as follows:</p> <p>“...administered by or on behalf of the Province of Ontario.”</p> <p>p. 87 – Section 6.2.3. states that MNR “shall be consulted” for fish community information prior to all development. It is recommended this policy be revised to state MNR “may be consulted.”</p> <p>p. 88 – Section 6.3, first paragraph, last sentence, identifies the features that the OP considers to be natural hazards. Consider the potential that radon should be included in the list of natural hazards. Radon is a colorless, odorless, tasteless noble gas. It is a radioactive element, occurring naturally as a decay product of radium which is one of the intermediate steps in the normal radioactive decay chains through which uranium decays into lead. Studies have shown that exposure to high</p>	<p>Concur. OP revised.</p> <p>No change required.</p> <p>Concur. OP revised.</p> <p>Concur. OP revised.</p> <p>OP revised to mention radon as a hazard. Dealing with the hazard of radon is addressed in the Building Code.</p>
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	<p>levels of radon can increase the risk for lung cancer. It is recognized that concentration of radon within the municipality varies widely and that the Building Code provides specific provisions specific to Elliot Lake to address potential health risks associated with radon. Possibly, given this and the zoning bylaws the municipality has in place to address radon, there is not a need for its inclusion in the official plan.</p> <p>Section 6.3.1.2 Wildland Fire – The following process could be added to this section to clearly depict the requirements for a wildland fire assessment associated with a complete application.</p> <p>Complete application requirements for level 1 site assessment:</p> <ul style="list-style-type: none"> • mapping that illustrates whether lands are treed/forested, and a statement concluding whether a level 2 assessment is necessary (i.e., whether lands are treed/forested). <p>Complete application requirements for level 2 site assessment:</p> <ul style="list-style-type: none"> • identification of the presence/absence of hazardous forest types on and/or in the vicinity of the subject lands; • description of the characteristics of the hazardous forest types (i.e., forest composition and condition); • location of proposed buildings/structures; • mitigation techniques to be applied to mitigate the risks associated with wildland fire (including proposed landscaping within 100 m of proposed buildings/structures); and • any known history of wildland fire in the area. <p>MNRF Values Information City of Elliot Lake – Potential Hazardous Forest Types for Wildland Fire: Since MNRF’s initial input package, as provided on January 10th, 2017, the information regarding hazardous forest types for wildland fire has been updated. The updated map and values is being provided for the City of Elliot Lake’s use (please see attached).</p>	<p>No change required. This will be contained in the wildland fire guidelines.</p>
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	<p>p. 88 – Section 6.2.5 – Given it is not clear whether the City intends to protect all wetlands from development as per previous comments regarding wetland in Section 1 of the table, it should be reiterated that the City is encouraged to do so as wetlands that are locally important also provide ecological services such as protecting water quality. Consideration of potential impacts to wetlands, whether provincially significant or locally important, should be part of evaluating development proposals.</p> <p>p. 91 – Section 6.3.2.1 – The text indicates that Tailings Management Areas are on the Schedule C. On examination of Schedule C, no tailings management areas are identified, rather they are identified on Schedule B – ensure text refers to the appropriate Schedule throughout. Additionally, any uranium tailings sites are under Federal Regulation. The City may wish to consider adding this reference to Section 6.3.2.1 of the OP.</p> <p>p. 3 - Section 7.3 – The City is encouraged to include bike racks in this policy.</p> <p>p. 7 - Section 8.8 (2) – It is recommended that a noise feasibility study/detailed noise study, a wildland fire assessment (level 1 and 2), ecological site assessment and a hauled sewage capacity (for disposal) confirmation be included in the list of supplementary information.</p> <p>p. 10 – Section 8.12 – The City may wish to consider shoreline areas as a potential site plan control area in an effort to promote naturalized shorelines and vegetated riparian areas to enhance and improve water quality. This is mentioned in Section 5.7.3.7, but consideration should be given to this section as well.</p> <p>This section could also include the use of site plan control to address natural hazards. Consider modifying the second last sentence to read: “...</p>	<p>No change required.</p> <p>Concur. OP revised regarding Schedule and Federal regulation.</p> <p>No change required.</p> <p>Concur. OP revised.</p> <p>No change required. City already has regulations in by-law to protect shorelines and vegetative areas. Plot development plan is required.</p> <p>Concur. OP revised.</p>
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	<p>where required to protect Natural Heritage Features and to address Natural Hazards.”</p> <p>Further, it should be more clear that site plan drawings can include exterior design, including without limitation scale, character, appearance and design features of buildings and their sustainable design but only to the extent that it is a matter of exterior design as per Section 41(4)(2)(d).</p> <p>p. 11 – Section 8.12.6 – This could be expanded to refer to broaden the types of sustainable design elements that could be addressed through site plan control as per Section 41(4)(2)(e) of the Planning Act.</p>	No change required.
RECOMMENDATIONS FOR ENANCEMENTS/EDITS FOR ACCURACY/EDITORIAL CHANGES		
1.	Section 4.3.5.7 – Correct section reference from 36 to 37	Concur. OP revised.
2.	Section 5.7.7 – In the second paragraph Crown Forest Sustainability licenses are referred to as agreements, this is incorrect. We recommend replacing the word “agreements” with “licenses”.	Concur. OP revised.
3.	Section 5.7.7 – This section states that the community is encouraged to enter “woodland improvement agreements” with the province. This program is no longer operational. A new program, the Managed Forest Tax Incentive Program (MFTIP), has been implemented in its stead. The City can endorse this program at its own discretion. Recommend removal of the following; “as a means to contribute to the quality of life and economic health of the community and to enter into Woodland Improvement Agreements with the Province.”	Concur. OP revised.

4.	Section 5.8 – It should be recognized that the Crown is not bound by the policies of this plan as it pertains to leases or land use permits. Recommend deleting the words “or tenanted development via leases or land use permits”. In the last sentence of the second paragraph and the use and development of those lands shall be in conformity to this Plan.”	Concur. OP revised.
5.	Section 6.1 – Ensure correct/consistent spelling of “archaeology” and its derivatives throughout the section to be consistent with PPS.	Concur. OP revised.
6.	Section 6.1.1.1 – Recommend removal of the term “significant”, and duplicated reference to cultural heritage landscapes.	Concur. OP revised.
7.	Section 6.1.1.3 – The City may wish to consider formally establishing a “Municipal Register of Property of Cultural Heritage Value or Interest”, comprising property designated under Parts IV or V of the Ontario Heritage Act, or properties not designated but identified as being of cultural heritage value or interest.	No change required.
8.	Section 6.1.1.7 & 6.2.3 – Change use of ‘Aboriginal’ to ‘Indigenous’	Concur. OP revised.
9.	Section 6.1.2.3 – Archaeological Assessments (AA) are conducted in Stages, not phases. Rather than specify the Stage of AA, the OP may state that “An Archaeological Assessment in accordance with the requirements of MTCS shall be required....” Similarly, 6.1.2.4 could be simplified by modifying the first sentence to read: “Where an area has archaeological potential, further archaeological assessment shall be required.”	Concur. OP revised.
10.	Section 6.2 – references section 6.6. There is no section 6.6 within the Draft OP, this error should be corrected.	Concur. OP revised.
11.	Section 6.2.5.1 – Typo. Should be PSW.	Concur. OP revised.

12.	Section 6.2 – Section 6.6 is referenced several times in this section. It is assumed the reference should be to section 6.5.	While Section 6.6 is now the correct reference, OP revised to delete specific Section reference.
COMMENTS ON THE SCHEDULES		
1.	<p>All Schedules</p> <ul style="list-style-type: none"> All highways should be clearly identified as Provincial Highways in the legends of all schedules in the OP. It should be clear to the public that these routes are under the jurisdiction of the province and, as such, are subject to the policies, standards and safety requirements of MTO. Suggest replacing “Expressway/Highway” with “Provincial Highway”. Also, Highway 639 should be shown on the schedules as a provincial highway in addition to Highway 108. Currently it is shown as an arterial/collector road. 	Concur.
2.	<p>Schedule A</p> <p>Schedule ‘A’ proposes to expand the urban settlement area boundary to the west of the City of Elliot Lake and include approximately 186 hectares of lands formerly designated Rural and now proposed to be designated Residential. A comprehensive review is therefore required. As defined in the PPS, a comprehensive review is an official plan amendment (such as a statutory review) which is:</p> <ul style="list-style-type: none"> is based on a review of population and employment projections and which reflect projections and allocations by upper-tier municipalities and provincial plans, where applicable; considers alternative directions for growth or development; and determines how best to accommodate the development while protecting provincial interests; 	The current approved OP has these lands designated as residential and within the urban service area, so it should be noted that no expansion to the urban settlement boundary is proposed as a result of this OP update. The proposed OP schedule was merely maintaining existing boundaries. The City has an agreement in place for the development of the Elliot Lake Retirement Living Lands (referred to in the comment). The City would like to maintain these lands within their

	<ul style="list-style-type: none"> • utilizes opportunities to accommodate projected growth or development through intensification and redevelopment; and considers physical constraints to accommodating the proposed development within existing settlement area boundaries; • is integrated with planning for infrastructure and public service facilities, and considers financial viability over the life cycle of these assets, which may be demonstrated through asset management planning; • confirms sufficient water quality, quantity and assimilative capacity of receiving water are available to accommodate the proposed development; • confirms that sewage and water services can be provided in accordance with policy 1.6.6; and • considers cross-jurisdictional issues. <p>There has been no background study to demonstrate that the proposed expansion is consistent with Section 1.1.3.8 of the PPS or that it meets the definition of a comprehensive review. Historical population growth rates from previous censuses do not appear to justify an expansion of the urban settlement area boundary. Furthermore, Section 3.2 of the OP states that there is a sufficient land supply for housing to meet the demand of the community over the next twenty years. Therefore we recommend removing the proposed expanded urban settlement area lands from the urban settlement area.</p> <p>Also, we recommend delineating the boundaries of the Mount Dufour Recreational Mixed Use Development on Schedule 'A'.</p>	<p>residential designation and urban settlement area.</p> <p>However, in consideration of the OW comment, the City has reviewed other lands within the urban settlement area, and proposed to reduce the area currently designated as residential that is in the interior (between Fox Drive and Pearson Drive) and two areas south of Pearson Drive. These are both proposed as Open Space and outside of the urban settlement area, providing an overall reduction of 120 ha.</p> <p>Concur. OP revised.</p>
3.	<p>Schedule B</p> <ul style="list-style-type: none"> • It is the intent of the Plan to provide for the management of the resources for mining, forestry, and mineral aggregate extraction. Schedule B appears to only show mineral potential for uranium. There are a number of other commodities of interest that must be 	

	<p>considered in respect to Section 2.4 of the PPS. These are all taken into consideration in the Metal Mineral Potential Evaluation Tool (MMPET) which was provided with the background information, January 9, 2017.</p> <ul style="list-style-type: none"> It is recommended that Schedule B, Mineral Potential overlay be revised to recognize the mineral potential outlined in the Metal Mineral Potential Evaluation Tool (MMPET) map provided on January 9, 2017. If assistance with the interpretation and application of this information is required, please contact Pierre Bousquet, NE Regional Land Use Geologist, Timmins at 705-235-1612 or pierre.bousquet@ontario.ca . Add NEF layer if applicable. The map provided by MNRF on January 10th 2017 titled MNRF values information – City of Elliot Lake (Mineral Aggregates Information) indicates certain areas as authorized – Inactive. Some of these areas have been omitted from Schedule B. Please add all “authorized, Inactive” sites as displayed on MNRF values information – City of Elliot Lake (Mineral Aggregates Section). Schedule B indicates within the legend that pits & quarries are “licensed”. MNRF has determined these areas as “Authorized, active” rather than licensed. Please change name within legend from “licensed” to “authorized, active.” In accordance with MNRF’s input package provided to the City, all deposits of Nipissing Diabase should be indicated on Schedule B. Deposits of Nipissing Diabase are indicated as “R” on Map 3 within MNRF’s Resource information package. This information should be added to schedule B. Added to schedule B identified under the 	<p>Concur. Since information was not able to be provided in a digitized format, the MMPET information will be attached as an Appendix and noted as such in the text.</p> <p>N/A.</p> <p>This information has not been provided in the GIS, and is out of scope to digitize.</p> <p>Concur. OP revised.</p> <p>See response to General Comment #4.</p>
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	<p>heading mineral aggregate resource as “Bedrock Deposit – Nipissing Diabase”.</p> <ul style="list-style-type: none"> • Primary and secondary deposits as displayed on Schedule B are considered incorrect terminology. Please replace primary with; “Sand & Gravel” and replace Secondary with; “Quarry Deposits”. • The five lots recently re-located on Dunlop Lake as part of the Elliot Lake Waterfront Development Project appear to be missing from Schedule B. Please add them. 	<p>Concur. OP revised.</p> <p>Concur. OP revised.</p>
4.	<p>Schedule C</p> <ul style="list-style-type: none"> • Spawning areas have not been identified as stated in section 6.2.3. Please add spawning areas to Schedule C, as identified on MNRF’s Values Information Map. Provided to the City on; (January 10th 2017) • Hazardous forest types for wildland fire should not be identified on Schedule C. This information was provided to be used in-house, combined with local information sources, to prepare documentation to identify the location of hazardous forest types for wildland fire. Please remove hazardous forest types for wildland fire from Schedule C. It is recommended that if the municipality wishes the information to be referenced somehow in the OP, that it be included as an appendix. • There are a number of natural heritage features identified on Schedule C which MNRF no longer tracks (e.g. wildlife wintering area, nesting sites, wildlife feeding areas, etc.). As such, MNRF does not have data to support or rationalize the inclusion of these features on Schedule C. MNRF strongly encourages the municipality to only show the natural heritage features provided as part of MNRF’s Resource Information Package on January 10, 2017, unless the municipality has in-house information to support 	<p>Concur. OP revised.</p> <p>Concur. OP revised to include MNRF Map as Appendix.</p> <p>Concur. OP revised.</p>

	<p>feature identification. If the municipality has internal information that supports the location of a natural heritage feature(s), MNRF would encourage them to share it with MNRF to help us to build our database of natural heritage features and areas. Comments on specific values are provided below, subject to the availability of data at the municipal level.</p> <ul style="list-style-type: none"> • Wildlife wintering areas are subject to change over the course of time. The information is not considered reliable as the MNRF no longer actively tracks this data. Please remove wildlife wintering area information from Schedule C. • Currently, the MNRF does not track the wildlife feeding areas as indicated on Schedule C. This information is not considered reliable at this time. Please remove wildlife feeding areas that aren't shown on MNRF Values Information – City of Elliot Lake (Other Values) from Schedule C. • All nesting sites should be removed from Schedule C that do not reflect the information as indicated on MNRF Values Information – City of Elliot Lake (Other Values). The only nesting site to be incorporated is Great Blue Heron. MNRF no longer actively tracks many of the indicated nesting site on Schedule C. Insert data concerning Great Blue Heron Nesting sites from MNRF Values Information – City of Elliot Lake (Other Values). Please remove all other information concerning nesting sites shown on Schedule C. Please label Great Blue Heron nesting sites as follows; “Significant Wildlife Habitat: Great Blue Heron”. • As indicated on MNRF’s Values Information Map – City of Elliot Lake (Other Values), Moose aquatic feeding areas should be incorporated into Schedule C. Please insert the data regarding Moose aquatic feeding areas from MNRF Values Information – City 	<p>Concur. OP revised.</p>
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	<p>of Elliot Lake (Other Values) into Schedule C. This should be identified as; “Significant Wildlife Habitat; Moose Aquatic Feeding Area” in the legend.</p> <ul style="list-style-type: none"> • The MNRF no longer actively tracks aquatic feeding area information as is currently reflected in Schedule C. Please remove all aquatic feeding area information indicated on Schedule C. This is separate and apart from the moose aquatic feeding area information that was provided January 10, 2017. • Lake trout lake information displayed on Schedule C is difficult to distinguish from regular waterbodies. Lake trout lakes should be made more visible and easily distinguished on Schedule C. The use of underlining or differentiating colours/patterns should be considered. • Colour schemes used on Schedule C are difficult to distinguish the differing values. Colour schemes should be altered to allow for a more user friendly visual of map values. • Marsh Lake is not listed as Lake Trout Lake in accordance with MNRF values. Please indicate Marsh Lake as a regular waterbody instead of a Lake Trout Lake. 	<p>Concur. OP revised.</p> <p>Concur. OP revised.</p> <p>No change required.</p> <p>Concur. OP revised.</p>
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