

February 8, 2016

Ms. Lisa Grbinicek
Acting Manager
Niagara Escarpment Commission
232 Guelph Street,
Georgetown, ON
L7G 4B1

Dear Ms. Grbinicek:

RE: Provincial Plan Review - NEP Mapping

OSSGA is a not-for profit association representing over 280 sand, gravel and crushed stone producers and suppliers of valuable industry products and services. Collectively, our members supply the majority of the 164 million tonnes of aggregate consumed, on average, annually in the province to build and maintain Ontario's infrastructure needs.

Further to your discussion with MHBC, we are writing to seek clarification on the NEC's proposed updates to the Niagara Escarpment Plan (NEP) mapping based on the existing designation criteria (Scenario 2) and the NEC's proposed designation criteria (Scenario 3).

The current NEP includes 56,893 ha of Escarpment Rural Lands and these lands have an objective "*To provide for the designation of new Mineral Resource Extraction Areas which can be accommodated by an amendment to the Niagara Escarpment Plan.*" The NEC is proposing to update its maps using the existing designation criteria which results in a 31% reduction of Escarpment Rural Area lands or apply new designation criteria which results in a 46.8% reduction in Escarpment Rural Area lands. Below is a chart that OSSGA has prepared summarizing the proposed changes by designation based on the information on the NEC website.

AREA CHANGE BY DESIGNATION	Scenario 1 (Existing)	Scenario 2 (Updated data)	% Change from Existing	Scenario 3 (Additional criteria)	% Change from Existing
Escarpment Natural Area	52,306 ha	85,433 ha	63.3%	90,933 ha	73.8%
Escarpment Protection Area	71,672 ha	57,892 ha	-19.2%	61,505 ha	-14.2%
Escarpment Rural Area	56,893 ha	39,255 ha	-31.0%	30,268 ha	-46.8%
Escarpment Recreation Area	7,456 ha	5,768 ha	-22.6%	5,768 ha	-22.6%
Mineral Resource Extraction Area	2,634 ha	2,632 ha	-0.1%	2,632 ha	-0.1%
Urban Area	4,077 ha	4,063 ha	-0.3%	3,939	-3.4%

Based on an initial review of the mapping, it is not clear to OSSGA and some of its members:

- What designation criteria have resulted in the proposed change from Escarpment Rural Area to either Escarpment Natural or Protection; and
- Which data layers are being used to map the applicable criteria.

To assist in our understanding, could the NEC please:

- provide a map showing which lands qualify for either Escarpment Natural or Protection by criteria; and
- provide a response to the following questions.

NEC Existing Designation Criteria - Scenario 2

(a) Existing Criteria for Designation for Escarpment Natural Area

1. *Escarpment slopes and related landforms associated with the underlying bedrock which are in a relatively natural state.*

Questions:

- a) Were any Escarpment Rural Lands remapped as Escarpment Natural Area based on this criteria? If so, what information was used to remap these areas.

2. *Where forest lands about the Escarpment, the designation includes the forested lands 300 metres (1,000 feet) back from the brow of the Escarpment slope (e.g. Bruce Peninsula).*

Questions:

- a) Were any Escarpment Rural Lands remapped as Escarpment Natural Area based on this criteria? If so, what was used to remap these areas?

3. *The most significant Areas of Natural and Scientific Interest (Life Science).*

Questions:

- a) Please confirm the NEC only used Provincial Life Science ANSI for this criteria (e.g. not Candidate Life Science ANSI).

4. *The most significant stream valleys and wetlands associated with the Escarpment.*

Questions:

- a) Please confirm the NEC only used Provincially Significant Wetlands to identify the most significant wetlands associated with the Escarpment.
- b) How were Significant Stream Valleys identified? What data layers were used to map this?

(b) Existing Criteria for Designation for Escarpment Protection Area

1. *Escarpment slopes and related landforms where existing land uses have significantly altered the natural environment (e.g. agricultural lands or residential development).*

Questions:

- a) Were any Escarpment Rural Lands remapped as Escarpment Protection based on this criteria? If so, what information was used to remap these areas? .

2. *Areas in close proximity to Escarpment slopes which visually are part of the landscape unit.*

Questions:

- a) Were any Escarpment Rural Areas remapped as Escarpment Protection Area based on this criteria? If so, what information was used to remap these areas?

3. *Regionally Significant Areas of Natural and Scientific Interest (Life Science) or areas designated as environmentally sensitive by municipalities or conservation authorities.*

Questions:

- a) Could the NEC please confirm that only Regional Life Significant ANSI were included (e.g. not Candidate Regional Life Science ANSI)?
- b) What data layers were used to map environmentally sensitive areas?

NEC Proposed Designation Criteria - Scenario 3

(a) Proposed Criteria for Designation for Escarpment Natural Area

1. Escarpment slopes, outliers and related landforms associated with the underlying bedrock which are in a relatively natural state.

Questions:

- a) Please confirm the only change to the mapping from Scenario 2 is the addition of outliers.
 - b) Could the NEC please provide a map showing the outliers and the source for the mapping?
2. Where forested lands abut the Escarpment, the designation includes the forested lands 300 metres (1,000 feet) back from the brow of the Escarpment slopes.

Questions:

- a) Please confirm there is no change compared to Scenario 2.
3. Provincially Significant Areas of Natural and Scientific Interest (Life Science).

Questions:

- a) Please confirm there is no change compared to Scenario 2.
4. Significant Valleylands, Provincially Significant Wetlands, and other wetlands 5 hectares in size or greater.

Questions:

- a) Please confirm that the only additional change compared to Scenario 2 is the addition of “other wetlands 5 hectares in size or greater”?

(b) Proposed Criteria for Designation for Escarpment Protection Area

1. Escarpment slopes, outliers and related landforms where existing land uses have significantly altered the natural environment (e.g. agricultural lands or residential development).

Questions:

- a) Please confirm the only change to the mapping from Scenario 2 is the addition of outliers.
 - b) Could the NEC please provide a map showing the outliers and the source for the mapping?
2. Areas in close proximity to Escarpment slopes which visually are part of the landscape unit.

Questions:

- a) Please confirm there were no additional changes compared to Scenario 2.
3. Regionally Significant Areas of Natural and Scientific Interest (Life Science) or Environmentally Sensitive or Significant Areas (ESAs) designated by municipalities or conservation authorities.

Questions:

- a) Please confirm there were no additional changes compared to Scenario 2.
4. Significant Woodlands

Questions:

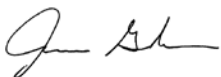
- a) Please confirm the criteria that was used to define significant woodlands (e.g. NEC draft criteria based on NEPDA 183-10 or municipal information).

Thank you for consideration of the above. Clarification of the points above will greatly assist in understanding the basis for the updated mapping and which criteria resulted in the changes.

We would be happy to meet with NEC Staff to assist in our understanding of the mapping changes.

If you have any questions, please do not hesitate to call.

Regards,



James Gordon
Chair, Ontario Stone Sand & Gravel Association