Source	Comment	Staff Response	Revised Reference (April 2010 Draft)	Further Action Recommended (*one-year review results follow in italics*)
Mississippi Valley Conservation (MVC)	We appreciate the 3-pronged approach (of different level of details required for different scale of impacts) and we believe this will provide a clear framework and set of standards through which impacts to natural features and functions can be measured based on the scale of the proposal. We find that our primary areas of interest, namely riverine systems and wetlands, are addressed and with our own policy development we anticipate that the Significant Wetlands portion can be expanded over time (to include assessment of hydrologic impacts as well). At this time, what is included is an excellent start.	None required.	N/A	Work with Conservation Authorities to ensure consistency of approach between EIS Guidelines and CA policies on features of mutual interest (as part of one-year review). *Done. Minor revisions made throughout guidelines to remind applicants of need to consult with CA.*
Ottawa Forests and Greenspace Advisory Committee (OFGAC)	The OFGAC approves the EIS Guidelines on the understanding that they be reviewed within one year to incorporate any required modifications or clarifications concerning the application of the EIS Guidelines to various development reviews.	None required.	N/A	Undertake review of EIS Guidelines one year following implementation. *Done.*
Environmental Advisory Committee (EAC)	The EAC would like to thank the City for the opportunity to comment on the draft EIS guidelines. While we are pleased the City is taking steps to develop such guidelines we have some significant concerns that the current draft is insufficient for the desired goals. In general the EAC believes that in order to	Comments and concerns will be addressed through consultation with EAC leading up to the one-year review. The EIS Guidelines have been prepared to assist in the implementation of Official Plan policies that are consistent with the Provincial Policy Statement (2005). Requirements that exceed the policies the Guidelines are intended to implement	N/A	Follow up with EAC. *No further comments or suggestions received on this topic.*

Source	Comment	Staff Response	Revised Reference (April 2010 Draft)	Further Action Recommended (*one-year review results follow in italics*)
	have the desired effect, these guidelines should be made mandatory elements of development and should also be applied to corporate (city) projects. The EAC also suggests that this EIS process could be a visionary example for other municipalities were it to embrace the recommendations in this [EAC] report and encourage or mandate proponents to not only avoid doing harm, but to contribute positively to the ecosystem. The EIS process could set a standard that goes above and beyond the provincial policy statement and official plan to truly protect and augment the ecological integrity of the city of Ottawa.	would not be enforceable. Many of the changes suggested by the EAC would require substantial changes to the policies of the Official Plan, and therefore cannot be addressed in the EIS Guidelines at this time.		
Greater Ottawa Home Builders Association (GOHBA)	Question whether these Guidelines are applicable, given that Official Plan Amendment 76 is currently under appeal. Will staff accept EIS reports already in preparation prior to the approval of these Guidelines?	A Foreword to the Guidelines has been prepared to address these issues. Staff believe that the Guidelines themselves represent good practice, and that while some of the triggers for an EIS are under appeal as part of OPA 76, this does not preclude the use of the Guidelines on any EIS that is triggered in the interim. In order to be accepted, an EIS already in preparation will need to meet the requirements of the PPS and the OP, and must have been prepared in accordance with direction provided by staff during pre-consultation occurring prior to the approval of the Guidelines.	Foreword	None (Foreword may be removed from Guidelines once these issues are no longer applicable). *Foreword has been revised.*

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GOHBA	Language used in the Guidelines must be very clear, to avoid future issues with misinterpretation by people unfamiliar with the intent of the text. There are opportunities for overly strict interpretation of the Guidelines as written, beyond what staff may have intended. This has happened before with other standards and guidelines issued by the City. Need to clarify "common sense" intent in general.	Portions of Section 3, Appendix 6 and Appendix 7 have been revised to clarify the field study requirements in response to comments received.	Section 3, Appendix 6 and Appendix 7	Follow up with stakeholders in preparation for one-year review. *No further comments or suggestions received on this topic.*
SENES	**3. EIS Process Flowchart** The document is text heavy and could benefit from some visual relief. Descriptive diagrams, and even some photographs of common best practices could be used to break up the text. A diagram that provides an overview of the EIS report preparation process, similar to the one in the draft EIS Guidelines prepared by the former Regional Municipality of Ottawa-Carleton, would be an effective communication tool.	Staff concur that the use of diagrams and other graphics would be beneficial.	Section 1.2, Appendix 4	Develop effective graphics for incorporation during one-year review. *One figure added; others may be added in future as time and resources permit.*
GOHBA	Could the EIS be submitted as a (substantially completed) draft at time of application, with the understanding that it and the project would not be approved until follow-up field work and finalization of recommendations were completed? The approval process typically takes several months, which provides opportunity for fine-tuning based on any necessary additional work. This could reduce some of the potential delays associated with the	This is an interesting suggestion; staff recognise that this approach could streamline the development review process, and is not necessarily inconsistent with the process outlined in the Guidelines. The conditions and circumstances would need to be clearly defined in order to avoid compromising the City's ability to protect significant natural heritage features and functions from negative impacts. This could be	N/A	Follow up with stakeholders in preparation for one-year review. *The guidelines have been revised to allow a Scoped EIS to be deferred in some cases, but this approach is not*

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	specific field seasons in the Guidelines.	explored further on a case-by-case basis in preparation for the one-year review.		*recommended for a Detailed EIS and has not been incorporated.*
SENES	Given the varied levels of understanding of how human development activities can impact upon ecological features and functions, consider an upfront outcome statement in the Introduction section that draws upon the overall purpose of the environmental policies under section 4.7 of the Official Plan. Such a purpose could borrow from the preamble to the policies of 4.7.8, noting that the purpose of an EIS is "to identify the natural features of a site early in the development process and consider ways to avoid or mitigate these impacts and enhance natural functions" (for an end result of no net loss of environmental features or functions).	This suggestion was not incorporated into the current version of the Guidelines. If revisions to the Introduction are deemed necessary, it will be considered as part of the one-year review.	N/A	As part of one-year review, consider revising Introduction to include statement as suggested, based on feedback received. *Introduction revised to include similar content.*
SENES	Section 1.2 of the Guideline states that "... an EIS is required when development or site alteration, as defined in section 4.7.8 of the Official Plan, is proposed...". Site alteration is required by a developer in many instances to undertake the range of studies required to support approvals, to obtain bank loans etc. (e.g. Phase 1&2 ESA's, Stage 1&2 Archaeological and Cultural Assessments). Undertaking an EIS report in advance of any site alteration related to preparation of these additional studies is critical. It is recommended that guidance be provided regarding when an	Section 2.2 has been revised to recommend that the initial field work for the EIS be conducted before site alteration occurs, and that the preliminary Tree Conservation Report include recommendations to avoid any environmental constraint areas identified during the field work. However, the City can only control pre-application activities involving tree clearing in the area regulated by the Urban Tree Conservation By-law. In other areas, the City does not have regulatory control over pre-application site alteration or tree clearing,	Section 2.2	Follow up with stakeholders in preparation for one-year review. *No further comments or suggestions received on this topic.*

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	EIS report should be performed relative to other studies to ensure that natural features are not inadvertently disturbed before assessment.	unless these activities contravene the Drainage By-law. Staff will include this timing issue as part of the one-year review, to try and establish the most effective process for accomplishing all necessary site work while still preserving significant natural features and functions.		
GOHBA	Suggest including rationale for various adjacency distances adopted in OPA 76 (30, 50 and 120 m).	Good suggestion; however, discussion of adjacency distances has now been removed from Guidelines text. Could possibly try and find appropriate place (appendix?) to insert this information during one-year review.	N/A	Consider inserting information as part of one-year review. *Done (see Section 1.2).*
OFGAC MNR	More precision in the guidelines about the circumstances under which an EIS might be waived. Comments regarding waiving of EIS Form completion in cases where staff review constitutes Scoped EIS: • MNR recommends that some record and rationale in writing is captured on file. • Recommend that the time limit for the exception is standardized – ensuring that all projects treated consistently. • Consideration of having a maximum time limit on the exemptions – i.e., don't continue to allow time limit to be	The Guidelines allow for the waiving of the need to complete the EIS Form in cases where there is little or no chance of negative impacts occurring, due to the nature of the proposed project, the distance between the project and the natural feature(s) and/or the environmental context of the site; in these cases, the staff review of the site and proposed project constitutes the (scoped) EIS. The intent here is to avoid spending time and money on an EIS where it provides no benefit to the natural heritage system. These decisions and supporting rationale will be documented as part of the pre-consultation process. Staff are required in such cases to have direct personal knowledge of the site, to reduce	Section 2.2	As part of one-year review, develop standard time limit and additional guidance for circumstances under which EIS Form may be waived, based on feedback received. *Additional guidance regarding the waiving or deferral of the Scoped EIS has been provided (see Section 2.1 and Appendix 2, Part C).*

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GOHBA	exceeded continuously. OPA 76 changes will trigger many more (Scoped) EIS requirements, including distant severances where impacts are highly unlikely – could a brief letter report from a consultant be acceptable in those conditions?	the likelihood of natural features being overlooked. Staff will consider under what circumstances a brief letter report might be used to support waiving the need to complete the EIS Form.		*No set time limit was established, due to lack of clear consensus on what length of time would be appropriate.*
SENES	Developers will likely continue to favor the retention of experts who prepare EIS reports with recommendations that provide the most development potential. With an array of related expertise available, many past EIS reports were prepared by landscape architects and foresters, rather than ecologists. City staff discussed how the City might gain control over consultants preparing EIS reports. Section 1.4 specifies that during pre-consultation, City staff and the applicant will together determine the qualifications of the individual or team that will prepare the EIS, with the qualifications determined by the scope of work required. This approach fulfills the initial objective for appropriate municipal control to obtain EIS's from qualified professionals. An additional approach to consider is that of a municipality in southern Ontario that has addressed this issue by maintaining a roster of qualified consultants that are placed on rotation as new EIS reports are required. This could be explored in future	The suggested alternative approach (i.e., rotating roster of qualified consultants) can be raised for discussion with stakeholders as part of the one-year review. It is likely, however, that the current practice of allowing applicants to hire their own consultant will continue. Provided that the EIS meets the City's standards as set by these Guidelines, the process by which a consultant is selected and retained is not important.	N/A	Raise idea of rotating roster of EIS consultants for discussion during one-year review. *Based on existing standards of practice for other technical reports required to support development applications in Ottawa, a rotating roster approach is not supported. A list of self-identified EIS practitioners will be developed and provided to applicants upon request during pre-consultation (see Section 1.4).*

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	versions of the guideline.			
M NR	Will the City be drafting a template for the ToR – minimum requirements etc?	Not at this time; the specifications included in the EIS Guidelines will provide the basis for development of individual ToR.	N/A	Determine whether a basic Terms of Reference should be developed as part of the one-year review. *This approach was not supported, given the wide range of potential requirements for each specific case; the EIS Guidelines provide sufficient direction.*
GOHBA	Table 2 – Under Urban and Rural Features an EIS is triggered if **any** of the 9 (urban) or 8 (rural) criteria are scored as moderate or greater. This would apply to almost all of the sites, and would include for example many urban natural areas that are rated low overall.	Table 2 (now Appendix 5) is not a list of EIS triggers; the triggers are defined in the Official Plan and are included in the EIS Decision Tool (Appendix 2 of the Guidelines). Appendix 5 is intended to provide a framework for the assessment of each of the different features that comprise the natural heritage system, using existing measurable standards of significance where possible (such as the criteria used in the UNAEES and NESS). It is intended as a reference for use during the scoping and preparation of the EIS, to ensure that the EIS adequately addresses the various attributes that contribute to a natural feature's status.	Section 2.1, Appendix 5	Determine whether further revisions are necessary based on feedback leading up to the one-year review. *Minor revisions made to Section 2.1 and Appendix 5 to further clarify the purpose of this Appendix.*
SNC	Table 2 (page 10): Rural Natural Feature: It states that and (sic) EIS is triggered if the NESS Study has listed "any" moderate or high rating. Is this referring to the "X" on the tables for each NESS summary? For clarification, this means that only one "X" in the Moderate or High category suffices?	The text in Section 2.2 has been revised		

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		to try and provide a clearer explanation of the purpose and use of Appendix 5.		
MNR	In Table 2, under Significant habitat of endangered and threatened species: • Consideration for SAR outside of specific PPS requirements – what about ESA requirements – should also be built into/ harmonized with EIS. • [significant habitat] to be confirmed/approved by MNR.	Staff will follow up with MNR to discuss the purpose and intended use of this table, and to determine whether any further revisions to the EIS Guidelines are needed in order to adequately address species at risk and their habitat.	N/A	Follow up with MNR. *No further comments or suggestions received on this topic.*
Novatech	The timing for posting of "security" needs to be clarified in Section 2.4.	This will be addressed, along with other issues relating to implementation and enforcement of the EIS recommendations, as part of the one-year review.	N/A	Investigate possible methods/ protocols for monitoring and enforcing compliance in preparation for one-year review. *No changes to guidelines identified. No further comments or suggestions received on this topic.*
SENES	The descriptions for content to be included within individual EIS report sections are appropriately detailed and should be quite helpful to those responsible for EIS reports. To further illustrate the desired content for the report, consider inclusion of sample visuals, such as of a General Map of the Natural Environment, map of vegetative cover.	Inclusion of sample visuals and other helpful graphics will be accomplished as part of one-year review.	N/A	Develop effective graphics for incorporation during one-year review. *Sample maps may be developed in future if resources permit.*

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OFGAC	Besides an existing conditions map at same scale as draft plan of subdivision or site plan, the EIS guidelines should require an overview map to show how land fits into the surrounding landscape – with a **minimum** of 120 m showing all around the subject lands, which includes all natural features, according to section 3.2, but even wider when ecologically connected, or if there are nearby sensitive features/receptors that are likely to be adversely affected.	The need for additional specifications regarding maps and figures will be considered as part of the one-year review.	N/A	Consider need for additional mapping specifications as part of one-year review. *Requirement for a scale bar added. No other specifications changed regarding mapping; however, requirements clarified with respect to description of adjacent lands.*
OFGAC	Indicators of sensitive groundwater features should be included (e.g. soil discoloration/iron staining or mineral precipitation – can create changes in water colour/odour, watercress, golden saxifrage, marsh marigold, yellow birch, marsh St. John's wort, goldthread, eastern hemlock, silky dogwood, marsh fern, swamp dewberry, during winter - areas of dark ice cover or ice-free conditions or water vapour)	Information on indicators can be considered for addition as part of the one-year review; these should be appropriately distributed among the specific subject areas and/or appendices.	N/A	Consider adding information on indicators. *This detailed information was not deemed necessary to the EIS Guidelines and has not been included.*
OFGAC	Specify that the raw data be time stamped and deposited for future use and reviewed by a competent, independent, professional to determine if the conclusions are accurate. Data, such as borehole data, must be placed in the city's borehole data repository.	Staff are unsure about what "raw data" is being referred to here, and under what circumstances an independent review is contemplated. These comments will be addressed through consultation with OFGAC leading up to the one-year review.	Section 3.2.3	Follow up with OFGAC. *No further comments or suggestions received on this topic.*

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Richcraft	Including the building envelopes, fences and driveway locations on the submitted plans makes sense for smaller projects, however at the subdivision level this is impossible at the on-set, as they get determined through-out the process. The same goes for any grading limitations, as this requires geotechnical work, which in some cases requires some site alteration to create access for the machinery to do the work. Can't get permission for site alteration until the EIS is complete. Perhaps these requirements are a bit too detailed.	Section 2.2 has been revised to recommend that the initial field work for the EIS be conducted before site alteration occurs, and that the preliminary Tree Conservation Report include recommendations to avoid any environmental constraint areas identified during the field work. However, the City can only control pre-application activities involving tree clearing in the area regulated by the Urban Tree Conservation By-law. In other areas, the City does not have regulatory control over pre-application site alteration or tree clearing, unless these activities contravene the Drainage By-law. Staff will include this timing issue as part of the one-year review, to try and establish the most effective process for accomplishing all necessary site work while still preserving significant natural features and functions.	Section 2.2, Section 3.3.2	Follow up with stakeholders in preparation for one-year review. *No further comments or suggestions received on this topic.*
GOHBA	How will "no negative impact" be interpreted and applied? Any activity could arguably have some impact, but at what point is it significant?	This question is addressed in the Foreword to the Guidelines. The definitions in the Official Plan and the Guidelines are taken from the Provincial Policy Statement, which does not prohibit development or the effects of development, but refers specifically to <u>degradation of the health or integrity of the features or functions for which an area is identified</u>. The basic principle of these Guidelines has been developed to further	Foreword	Determine whether further guidance is necessary based on feedback leading up to the one-year review. *No further comments or suggestions received on this topic. Discussion of*

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		emphasise this point.		*"no negative impact" has been moved into the body of the guidelines (see Section 3.4.1.)*
OFGAC	It isn't stated clearly that what is needed is a measure of the baseline condition of the site – i.e. before any clearance takes place. While some work may be needed to gain access for drilling boreholes, there should be an ecological inventory in order to determine impacts prior to any such destructive testing procedures.	Section 2.2 has been revised to recommend that the initial field work for the EIS be conducted before site alteration occurs, and that the preliminary Tree Conservation Report include recommendations to avoid any environmental constraint areas identified during the field work. However, the City can only control pre-application activities involving tree clearing in the area regulated by the Urban Tree Conservation By-law. In other areas, the City does not have regulatory control over pre-application site alteration or tree clearing, unless these activities contravene the Drainage By-law. Staff will include this timing issue as part of the one-year review, to try and establish the most effective process for accomplishing all necessary site work while still preserving significant natural features and functions.	Section 2.2	Follow up with stakeholders in preparation for one-year review. *No further comments or suggestions received on this topic.*
EAC	Subsection 3.4.2 and related sections are too vague and permissive. The EAC suggests that the rules will only work if they are clear, comprehensive and systematically monitored by	The definitions in the Guidelines are taken from the Official Plan, and ultimately from the Provincial Policy Statement. The Foreword to the Guidelines was developed in part to address the interpretation of "no negative impact."	Foreword	Determine whether further guidance on impacts is necessary based on feedback leading up to the one-year review.

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	knowledgeable experts. As such, the EAC makes the following recommendations: • **Create a clearer explanation of what an environmental impact is, besides simply explaining significant impacts**	Staff will determine whether additional clarification or guidance on the concept of impacts is necessary in preparation for the one-year review.		*No further comments or suggestions received on this topic.*
OFGAC	• "Concerns are often raised about the long-term changes that may occur not only as a result of a single action but the combined effects of each successive action on the environment. Cumulative Effects Assessment (CEA) is done to ensure the incremental effects resulting from the combined influences of various actions are assessed. These incremental effects may be significant even though the effects of each action, when independently assessed, are considered insignificant." (source: Canadian Environmental Assessment Agency). • In other words, the objective is to look backward and forward in time (at completed or planned projects), and to look around the area for other activities that could contribute to effects beyond those of the current project. Effects of the actions could be felt locally or they could be felt elsewhere. This kind of study could be complicated by jurisdictional boundaries, since some	The OFGAC makes several valid points, but their intent is unclear; none of these points are framed as suggested edits to the text.	N/A	Follow up with OFGAC to see whether any of these points were intended as edits, and consider including them as part of one-year review. *No further comments or suggestions received on this topic.*

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	projects (hydro, transport) are undertaken through other levels of government. • One example of cumulative effects could relate to the grading of land or removal of trees, in contiguous or nearby areas. Another example might be removal of plant species that are rare—because they were already impacted before this project was started. • In the case of tree removal, the effects could be on the species, or the soil, or the water table, on ground or surface water movement, or flora and fauna in the area. These could be identified as potential effects of cumulative effects, and a request made for these to be evaluated.			
OFGAC	Who will check that educational material for local residents is well written, accurate and actually produced and distributed, much less read by the resident and adhered to?	The current practice is to apply a condition of approval requiring such material to be produced by the applicant's consultant, to the satisfaction of the City. While the information is supposed to be provided to each new landowner, the City has no way to ensure that future property owners read and abide by the information, unless their actions contravene a City by-law or other applicable regulation. Staff note that, based on past experiences, the development of a standard set of educational materials that	N/A	Consider developing standard set of educational materials that can be adapted as needed, as part of one-year review. *Although a standard set of information would still be useful, staff were not able to undertake this work during the one-year*

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		could be adapted for use in specific circumstances would greatly facilitate this process and improve the quality and consistency of the information provided to residents. This material could also be made available on the City's web site for general reference.		*review period due to higher priorities taking precedence.*
EAC	Similar to our earlier comments regarding safeguards, the EIS process needs to ensure that what is agreed upon in the final EIS and mitigation measures is actually what will happen on the ground. Trained and qualified city staff should monitor the project to ensure this.	The Guidelines specify that recommendations will be incorporated into conditions of approval, and that financial securities may be required to ensure that the conditions are met (see Section 2.4). Methods and protocols for monitoring and enforcing compliance will be investigated for possible incorporation during the one-year review.	N/A	Investigate possible methods/ protocols for monitoring and enforcing compliance in preparation for one-year review.

No changes to guidelines identified; City has limited ability to monitor projects or enforce compliance at this time due to resourcing and regulatory issues. |
| OFGAC | There is helpful discussion of setbacks and buffers; however, these agreed-upon limits may be overlooked during and/or after the construction phase. Is there a centralized place for maintaining and updating this information? Since monitoring of limits is not always undertaken or enforced, and because these limits are conditions for allowing a development to proceed, an interim step might be to provide for posting the information somewhere public—either on site and/or on the Internet. | The Guidelines specify that recommendations will be incorporated into conditions of approval, and that financial securities may be required to ensure that the conditions are met (see Section 2.4). Methods and protocols for monitoring and enforcing compliance will be investigated for possible incorporation during the one-year review. | N/A | Investigate possible methods/ protocols for monitoring and enforcing compliance in preparation for one-year review.

Section 3.5.1 has been revised to require the inclusion of setback limits on project plans, and to |

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				require protective measures to be in place prior to commencement of on-site works (in keeping with Urban Tree Conservation By-law and typical conditions of approval).
OFGAC	The EIS Guidelines need to be strengthened in terms of monitoring. Self regulation in this instance does not work. When a good EIS Document is submitted and recommendations in the report are accepted by the proponent and city staff, it should be stated that the recommendations will become part of the Conditions of Approval for the development application. To ensure that the recommendations are carried out accordingly, a protocol describing how the follow-up will be done and identifying who is responsible for monitoring the implementation of the EIS report must be made clear and form part of the EIS Guidelines. This part of the EIS Guidelines needs to be strengthened (monitoring is a major concern, as discussed in our openings remarks). This is one of a few places in the guidelines where it is unclear who is expected to do what. It would help to	Staff heard a similar comment at the Rural Issues Advisory Committee meeting; the suggestion was made that developers should be required to provide appropriate funding to implement required monitoring programs to ensure the effectiveness of mitigation (with monitoring to be conducted by a third party agreed upon by the City and the developer). The Guidelines already state that recommendations will be incorporated into conditions of approval (see Section 2.4). Methods and protocols for ensuring or enforcing compliance will be investigated for possible incorporation during the one-year review.	N/A	Investigate possible methods/ protocols for ensuring or enforcing compliance in preparation for one-year review. *No changes to guidelines identified; City has limited ability to monitor projects or enforce compliance at this time due to resourcing and regulatory issues.*

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	assign responsibilities to the proponent and the City.			
OFGAC	If monitoring is to be effective, it must start from a good set of baseline data, collected before site clearance or any destructive testing commenced on the site.	Section 2.2 has been revised to recommend that the initial field work for the EIS be conducted before site alteration occurs, and that the preliminary Tree Conservation Report include recommendations to avoid any environmental constraint areas identified during the field work. However, the City can only control pre-application activities involving tree clearing in the area regulated by the Urban Tree Conservation By-law. In other areas, the City does not have regulatory control over pre-application site alteration or tree clearing, unless these activities contravene the Drainage By-law. Staff will include this timing issue as part of the one-year review, to try and establish the most effective process for accomplishing all necessary site work while still preserving significant natural features and functions.	Section 2.2	Follow up with stakeholders in preparation for one-year review. *No further comments or suggestions received on this topic.*
SNC	Section 3.7 "Summary and Recommendations": Would it be possible to add in a paragraph regarding how the recommendations should be worded? I am thinking along the lines when EIS reports are then accepted, and recommendations can then form draft plan conditions for site plans and subdivisions. 2nd paragraph of Section 3.7 – perhaps an additional bullet	This interesting and worthwhile suggestion will be considered as part of the one-year review.	N/A	Discuss possible ways this could be done (how much guidance would be needed to obtain good results?) with development review staff and others.

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	point can be added stating the conditions recommended …			*No changes to guidelines identified; staff have developed a more extensive menu of sample environmental draft conditions to supplement the existing standard conditions where necessary.*
SENES	The fourth paragraph of this section refers to a sign-off requirement where a multi-disciplinary team has contributed to the preparation of the EIS. The requirements of this section are somewhat unclear and might benefit from additional detail. The intent of the review may be stated as a means to ensure that any recommendations brought forward are not mutually exclusive. Please note that this sign-off requirement for an EIS might be confused with the sign-off requirement for an Integrated Environmental Review.	Staff concede that this requirement is similar to the IER process; however, it is considered to be a reasonable requirement to ensure that no issues or recommendations are overlooked in the preparation of the EIS report.

A review of the policies and requirements for each of the IER and the EIS may be warranted, to minimise or eliminate any unnecessary duplication of effort. This could be addressed during the one-year review, although any changes to Official Plan policies may be deferred to the next Official Plan review to ensure appropriate public consultation occurs. | N/A | Recommend comparative review of IER and EIS to address areas of overlap or duplication of effort.

Identified as a work item for the upcoming Official Plan Review. |
| RVCA | Provided "EIS Form – Impacts Checklist" to augment the Impacts and Mitigation part of the EIS Form. | This checklist appears similar to the EIS trigger checklist in Appendix 2. Staff will follow up with RVCA to determine how this checklist is intended to be used, and consider whether it should be incorporated into the Guidelines as part of the one-year review. | Appendix 2 | Follow up with RVCA.

Done. No further action required. |

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GOHBA	Community descriptions for detailed EIS reports must follow the methods outlined in the Ecological Land Classification for Southern Ontario (Lee et al. 1998) to Vegetation Community Type. This would significantly increase the time required to complete the EIS as detailed soil survey work and additional vegetation community descriptions would be required for each vegetation community along with completion of stand and soil characteristic forms and other data cards.	Portions of Section 3, Appendix 6 and Appendix 7 have been revised to clarify the field study requirements in response to comments received. The intent is to ensure that vegetation communities identified in Detailed EIS reports are consistent with the ELC.	Section 3, Appendix 6 and Appendix 7	Follow up with stakeholders in preparation for one-year review. *No further comments or suggestions received on this topic.*
EAC	Concerns about the quality and lack of information on birds (page 47 and 51-57): • lack of certain bird species at risk that breed in the area on the list • limit of inclusion of only breeding birds ignores migrating, non-local breeding birds that may depend on local habitat for staging, stopovers or wintering grounds • data collection protocols may need to be strengthened	The list in the Guidelines was compiled based on a review of the 2005 Breeding Bird Atlas data, the previous list of breeding birds generated during the NESS study by the former Region, and species at risk occurrence data and range mapping. City and MNR staff would be very interested in any additional records of species at risk in the City. Seasonal habitat for migratory birds (staging areas, etc.) is addressed as significant wildlife habitat, provided that it meets the criteria established by the Ministry of Natural Resources.	N/A	Follow up with EAC. *No further comments or suggestions received on this topic.*
MNR	Butternut: 25 m 'buffer' for butternut may cause an issue and result in problems re: contravention of ESA (2007). Work outside of 25 m can occur that may completely impact the species. Subject of EIS is to recognize the potential impacts associated with the particular project and	Text in Appendix 10 has been revised. Staff will continue to work with, and recommend consultation with, MNR to ensure that butternut and other species at risk are appropriately protected.	Appendix 10 – Standard mitigation measures for the City of Ottawa (butternut)	Follow up with MNR. *Done. MNR has indicated support of revised text.*

Source	Comment	Staff Response	Revised Reference (April 2010 Draft)	Further Action Recommended (*one-year review results follow in italics*)
	how that could potentially impact species.			
MNR	Species at Risk: MNR suggests that with a six month window, that could potentially put the proponent into jeopardy with respect to changes in SARO list. MNR recommends wording should read: SARO list should be reviewed and cross referenced with EIS outcome prior to commencing site activities. This further speaks to the importance of documenting all of what is at the site at time of EIS.	Text has been revised to require SAR review immediately prior to on-site work. Implementation and enforcement of this requirement may need further planning and guidance as part of one-year review.	Appendix 10 – Standard mitigation measures for the City of Ottawa (SAR)	In consultation with stakeholders, consider how this should be implemented and what additional guidance is needed, as part of one-year review. *New Council-directed requirement for updating of EIS prior to registration may help to address concerns over changes in species at risk status (see new Section 2.5).*