

July 2, 2026

AEC 24-305

David Mayer
1043 Pine Grove Road
Penetanguishene, ON
L9M 2B7

Re: **Scoped Environmental Impact Study Addendum #1 1043 Pine Grove Road,
Town of Penetanguishene**

To David Mayer:

Azimuth Environmental Consulting Inc. (Azimuth) prepared a Scoped Environmental Impact Study (EIS) for the proposed development (severance and single detached dwelling) associated with the property located at 1043 Pine Grove Road within the Town of Penetanguishene (Town)(January 9, 2026). Azimuth has reviewed the Severn Sound Environmental Association (SSEA) EIS) Review comments prepared following their review of the aforementioned report (Michelle Hudolin (SSEA); June 4, 2026).

In response to SSEA's June 2026 review comments, Azimuth has prepared this EIS Addendum. The response below constitutes EIS Addendum #1 and should be considered in conjunction with the content of the initial EIS submission dated January 9, 2026. All updated supplementary materials pertaining to Azimuth's EIS submission are attached to this EIS Addendum.

Azimuth Response to SSEA Comment #1 and #6b:

Since completion of the EIS, Ontario's legislative framework for Species at Risk (SAR) has changed. The original EIS was prepared with consideration of the *Endangered Species Act, 2007* (ESA), which has since been repealed. This addendum has been prepared to update the report to reflect the current legislative framework, including Ontario's *Species Conservation Act, 2025* (SCA) and the federal *Species at Risk Act* (SARA).

Species Conservation Act, 2025

The SCA is Ontario's legislation aimed at protecting species at risk, which replaced the previous ESA, on March 30, 2026. The SCA provides regulatory protection to



Endangered and Threatened species listed as Protected Species in Ontario, through regulation of harm and/or killing of individuals and destruction of their habitats. In the case that an activity may result in the killing and/or harming of Threatened or Endangered species and their habitats, the activity must remain in compliance with Section 16 of the SCA which outlines processes for demonstration of conformity with the SCA, such as filing of a Registration including a Conservation Plan and subsequent monitoring.

The SCA defines “habitat” to include:

2 (1) (a) in respect of an animal species,

(i) a dwelling-place, such as a den, nest or other similar place, that is occupied or habitually occupied by one or more members of a species for the purposes of breeding, rearing, staging, wintering or hibernating; and,

(ii) the area immediately around a dwelling place described in subclause (i) that is essential for the purposes set out in that subclause.

(b) in respect of a vascular plant species, the critical root zone surrounding a member of the species; and,

(c) in respect of all other species, an area on which any member of a species directly depends in order to carry on its life processes; (“habitat”).

The various schedules of the SCA included under O. Reg. 230/08 identify SAR in Ontario. These include species listed as Extirpated, Endangered, Threatened and Special Concern. As noted above, only species listed as Endangered or Threatened receive protection from harm and destruction to habitat on which they depend.

Migratory birds protected under the *Migratory Birds Convention Act*, 1994 (MBCA) and aquatic species listed under the federal *Species at Risk Act* are not afforded protection under the SCA, therefore species and habitat protections for these taxa are considered under the federal legislative framework.

Species at Risk Act, 2002

The federal SARA provides regulatory protection to species designated as Endangered or Threatened under the Act through prohibition of killing, harm, or harassment of individual listed wildlife species (Section 32) or their residence (Section 33). A species’



residence is defined under SARA as *“a dwelling-place, such as a den, nest or similar area or place, that is occupied or habitually occupied by one or more individuals during all or part of their life cycles, including breeding, rearing, staging, wintering, feeding or hibernating.”*

As outlined in Section 34 of SARA, the *Act* generally only applies to listed species on federal lands. Aquatic species and migratory bird species listed under the federal MBCA with a defined critical habitat area could be protected but would require a Section 61 “Safety Net” order and/or a Section 80 “Emergency” order signed by the federal Minister in order to receive SARA protection status. Species not meeting these criteria are administered in accordance with protections enforced by provincial legislation (*e.g.*, Ontario’s SCA).

SAR Review

To ensure the EIS reflects the current legislative framework, the SAR assessment has been reviewed using the current provincial and federal species listings and applicable legislation. An updated SAR screening table is included as an attachment to this addendum and supersedes the table included in the original report.

Following this review, no changes have been identified that alter the findings or conclusions of the original EIS with respect to SAR. The SAR habitat assessments, field investigations, and evaluation of potential project effects remain applicable, and no additional SAR constraints have been identified that would affect the proposed development or require revisions to the conclusions within the EIS.

In order to reflect the active season for the three migratory bat species (Eastern Red Bat, Hoary Bat and Silver-haired Bat), a revised ‘active’ timing window of April 1 – November 30 is now recommended. This is based on information received from the Ministry of Conservation, Environment and Parks (MECP) in January 2026. Therefore; Section 8.2 of the EIS (Migratory Breeding Birds and Bats) is amended as follows:

Activities involving the removal of vegetation should be restricted from occurring during the breeding season. Migratory birds, nests, and eggs are protected by the *Migratory Birds Convention Act, 1994* (MBCA) and the *Fish and Wildlife Conservation Act, 1997* (FWCA). Environment Canada outlines dates when activities in any region have potential to impact nests at the Environment Canada Website



(<https://www.canada.ca/en/environment-climate-change/services/avoiding-harmmigratory-birds/general-nesting-periods/nesting-periods.html>). In Zone C2 vegetation clearing should be avoided between **April 1 through August 31** of any given year. If work requires that vegetation clearing is required between these dates screening by an ecologist with knowledge of bird species present in the area could be undertaken to ensure that the vegetation has been confirmed to be free of nests prior to clearing.

Activities involving tree removal on the property, should be avoided between **April 1 through November 30** of any given year, during the active period for bat species that may utilities trees for maternity and day roosting purposes. It is anticipated that adherence to this timing restriction will avoid impacts to individual SAR bats, therefore remaining in compliance with the SCA affording individual protection to Endangered species.

Through their review, SSEA has offered additional mitigation considerations including:

- a) Erosion and sediment control (ESC) fencing should be consistent with provincial reptile and amphibian exclusion fencing best practices;
- b) The FWCA protects other wildlife species, including early nesting, non-migratory birds such as hawks and owls (winter breeders). The property owners are responsible to ensure that activities do not contravene the applicable legislation such as the MBCA, FWCA and the SCA in addition to local regulations (i.e. tree cutting by-laws) and are responsible for obtaining permits/approvals, as required; and
- c) Equipment and vehicles should be inspected and cleaned prior to entering the site to prevent spread of invasive species.

Provided the mitigation measures and recommendations identified in the original EIS, EIS Addendum #1 and as contained within the SSEA review letter (June, 2026) are incorporated into the detailed design and implemented throughout construction of the proposed development, no negative impacts to the identified natural heritage features and functions (including SAR or their habitats) are anticipated.



CONCLUSIONS

Azimuth is of the opinion that the above responses and attachments adequately address SSEA's technical natural environment review comments regarding Azimuth's EIS submission for the proposed development.

Certainly, should you have any questions or concerns, or wish to discuss further please do not hesitate to contact the undersigned.

Yours truly,

AZIMUTH ENVIRONMENTAL CONSULTING, INC.

Jordan Wrobel, B.Sc.
Terrestrial Ecologist

Attached:

SAR Table 1

SSEA EIS Review – 1043 Pine Grove Rd, Town of Penetanguishene

Common Name	Species Name	SCA ²	COSSARO ³	SARA	Key Habitats Used By Species ¹	July 2026 Addendum Assessment
Bank Swallow	<i>Riparia riparia</i>	N/A	THR	THR	Nests in burrows excavated in natural and human-made settings with vertical sand and silt faces. Commonly found in sand or gravel pits, road cuts, lakeshore bluffs, and along riverbanks (COSEWIC, 2013a).	Key habitat requirements for the species (<i>e.g.</i> , vertical silt faces) are not found in the study area. Species not expected to occur.
Barn Swallow	<i>Hirundo rustica</i>	N/A	SC	THR	Ledges and walls of man-made structures such as buildings, barns, boathouses, garages, culverts and bridges. Also nest in caves, holes, crevices and cliff ledges (COSEWIC, 2011a).	No barn swallow nests observed on the existng sturcutres on the property. Species not expected to occur.
Black Ash	<i>Fraxinus nigra</i>	END	END	No Status	Facultative wetland tree species frequently found in floodplain forests, swamps, seepage areas, shoreline margins and fens. Occupied sites are generally seasonally-flooded (COSEWIC, 2018a).	Species was not observed within the study area.
Black Tern	<i>Chlidonias niger</i>	N/A	SC	No status	Colonial nesters typically found within marshes. Its preferred nesting habitat is a hemi-marsh (<i>i.e.</i> a wetland with 50:50 open water and emergent vegetation). Nests are usually built on an upturned cattail root, floating vegetation mat or patch of mud (Cadman <i>et al.</i> , 2007).	Marsh component of the St. Andrew's PSW complex does not occur within 120m of the subject property according to SSEA (2004). Species not expected to occur in study area.
Blanding's Turtle	<i>Emydoidea blandingii</i>	THR	THR	END	Blanding's Turtles are a primarily aquatic species that prefer wetland habitats, lakes, ponds, slow-moving streams, etc., however they may utilize upland areas to search for suitable basking and nesting sites. In general, preferred wetland sites are eutrophic and characterized by clear, shallow water, with organic substrates and high density of aquatic vegetation (COSEWIC, 2016a).	MNR NHIC databases includes records of Blanding's Turtle within 1km of the study area (square 17NK8561), key habitat requirements for the species are found in the study area. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Bobolink	<i>Dolichonyx oryzivorus</i>	N/A	THR	THR	Nests primarily in forage crops (<i>e.g.</i> hayfields and pastures) dominated by a variety of species such as clover, Timothy, Kentucky Bluegrass, tall grass, and broadleaved plants. Also occurs in wet prairie, graminoid peatlands, and abandoned fields dominated by tall grasses. Does not generally occupy fields of row crops (<i>e.g.</i> corn, soybeans, wheat) or short-grass prairie. Sensitive to habitat size and has lower reproductive success in small habitat fragments (COSEWIC, 2010).	Although MNR NHIC databses includes records of Bobolink within 1km of the study area (squares 17NK8625, 17NK8661, 17NK8560, 17NK8459, 17NK8561, 17NK8460, 17NK8559, 17NK8660), key habitat requirements for the species (<i>e.g.</i> , large grasslands) are not found in the study area. Species not expected to occur.
Broad Beech Fern	<i>Phyopteris hexagonoptera</i>	N/A	SC	SC	Rich soils in deciduous forests, such as Maple-Beech forests (MECP, 2022).	Species was not observed within the study area.
Butternut	<i>Juglans cinerea</i>	END	END	END	Commonly found in riparian habitats, but is also found in rich, moist, well-drained loams, and well-drained gravels. Butternut is intolerant of shade (COSEWIC, 2017a).	Species was not observed within the study area.
Canada Warbler	<i>Cardellina canadensis</i>	N/A	SC	THR	Wet, mixed deciduous-coniferous forests with a well developed shrub layer. Shrub marshes, Red-Maple stands, cedar stands, Black Spruce swamps, larch and riparian woodlands along rivers and lakes (COSEWIC, 2020).	Key habitat requirements for the species (<i>e.g.</i>, mixed forests) are found in the study area. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Chimney Swift	<i>Chaetura pelagica</i>	N/A	THR	THR	Nests primarily in chimneys though some populations (<i>i.e.</i> in rural northern areas) may nest in cavity trees (COSEWIC, 2018b). Recent changes in chimney design may be a significant factor in recent declines in numbers (Cadman <i>et al.</i> , 2007).	No uncapped chimneys present on the property. Species not expected to occur.
Common Five-lined Skink (Southern Shield population)	<i>Plestiodon fasciatus</i>	N/A	SC	SC	Southern Shield population -rocky outcrops embedded in a matrix of coniferous and deciduous forest, and individuals in these populations seek refuge under rocks overlaid on open bedrock (COSEWIC, 2021a).	Key habitat requirements for the species (<i>e.g.</i> , rock outcrops) are not found in the study area. Species not expected to occur.
Common Nighthawk	<i>Chordeiles minor</i>	N/A	SC	SC	Open habitats including sand dunes, beaches recently logged/burned over areas, forest clearings, short grass prairies, pastures, open forests, bogs, marshes, lakeshores, gravel roads, mine tailings, quarries, and other open relatively clear areas (COSEWIC, 2018c).	Key habitat requirements for the species (<i>e.g.</i> , open forests) are not found in the study area. Species not expected to occur.
Eastern Meadowlark	<i>Sturnella magna</i>	N/A	THR	THR	Most common in grassland, pastures, savannahs, as well as anthropogenic grassland habitats, including hayfields, weedy meadows, young orchards, golf courses, restored surface mines, <i>etc.</i> Occasionally nest in row crop fields such as corn and soybean, but there are considered low-quality habitat. Large tracts of grassland are preferred over smaller fragments and the minimum area required is estimated at 5ha (COSEWIC, 2011b).	Although MNR NHIC databses includes records of Eastern Meadowlark within 1km of the study area (squares 17NK8625, 17NK8661, 17NK8560, 17NK8459, 17NK8561, 17NK8460, 17NK8559, 17NK8660), key habitat requirements for the species (<i>e.g.</i> , large grasslands) are not found in the study area. Species not expected to occur.
Eastern Musk Turtle	<i>Sternotherus oderatus</i>	N/A	SC	SC	Inhabit littoral zones of waterways such as rivers, lakes, bays, streams, ponds, canals, and swamps with slow to no current and soft bottoms. During the active season they prefer shallow water (<2m) with abundant vegetation. Most are found close to shore and do not venture onto land except to nest or access adjacent wetlands (COSEWIC, 2012a).	Key habitat requirements for the species (<i>e.g.</i>, lake with soft bottom) are found in the study area. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.

Common Name	Species Name	SCA ²	COSSARO ³	SARA	Key Habitats Used By Species ¹	July 2026 Addendum Assessment
Eastern Red Bat	<i>Lasiurus borealis</i>	END	END	Not Listed	Roosting habitat include deciduous and coniferous forests of any age class. Maternity roost trees tend to be large diameter and tall, reaching or exceeding the height of the surrounding canopy with southern exposure and sheltered from the wind (COSEWIC, 2023).	Key habitat requirements for the species (<i>e.g.</i> , mature trees) are found in the study area. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Eastern Ribbonsnake	<i>Thamnophis sauritus</i>	N/A	SC	SC	Found in wetland habitats with both flowing and standing water such as marshes, bogs, fens, ponds, lake shorelines and wet meadows. Most sightings occur near the water's edge (COSEWIC, 2012b).	Key habitat requirements for the species (<i>e.g.</i> , wetlands) are found in the study area. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Eastern Small-footed Myotis	<i>Myotis Llebii</i>	END	END	No Status	Generally occurs in mountainous or rocky regions as well as in buildings, on the face of rock bluffs and beneath slabs of rock and stones. Hibernation is typically confined to caves and old mines (Best and Jennings, 1997).	Key habitat requirements for the species (<i>e.g.</i> , caves, rock rows) are not found in the study area. Species is not expected to occur.
Eastern Whip-poor-will	<i>Antrostomus vociferus</i>	N/A	SC	THR	Semi-open forests or patchy forests with clearings, such as barrens or forests that are regenerating following major disturbances, are preferred nesting habitats (COSEWIC, 2009a).	Key habitat requirements for the species (<i>e.g.</i> , forest clearings) are not found in the study area. Species not expected to occur.
Eastern Wood-pewee	<i>Contopus virens</i>	N/A	SC	SC	Mostly in mature and intermediate-age deciduous and mixed forests having an open understory. It is often associated with forests dominated by Sugar Maple and oak. Usually associated with forest clearings and edges within the vicinity of its nest (COSEWIC, 2012c).	MNR NHIC databses includes records within 1km of the study area (squares 17NK8660, 17NK8559, 17NK8661, 17NK8659), key habitat requirements for the species are found in the study area. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Grasshopper Sparrow <i>pratensis</i> subspecies	<i>Ammodramus savannarum pratensis</i>	N/A	SC	SC	Typically breeds in large human-created grasslands (≥5 ha), such as pastures and hayfields, and natural prairies, such as alvars, characterized by well-drained, often poor soil dominated by low, sparse perennial herbaceous vegetation (COSEWIC, 2013b).	Key habitat requirements for the species (<i>e.g.</i> , large grassland) are not found in the study area. Species not expected to occur.
Henslow's Sparrow	<i>Ammodramus henslowii</i>	N/A	END	END	Requires grassland habitat and occurs more frequently and at higher densities in large patches of suitable habitat. Nests in tallgrass prairie, wet meadow, and marsh habitats as well as agricultural grasslands, lightly grazed pasture and grasslands on reclaimed surface mines (COSEWIC, 2011c).	Key habitat requirements for the species (<i>e.g.</i> , large grassland) are not found in the study area. Species not expected to occur.
Hoary Bat	<i>Lasiurus cinereus</i>	END	END	Not Listed	Utilize mostly treed habitats (deciduous and coniferous of any age class) for roosting or foraging. Maternity roost trees tend to be large diameter and tall, reaching or exceeding the height of the surrounding canopy with southern exposure and sheltered from the wind. Hoary Bats typically roost among the foliage of trees and occasionally shrubs and are typically solitary roosters (COSEWIC, 2023).	Key habitat requirements for the species (<i>e.g.</i> , mature trees) are found in the study area. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Lake Sturgeon (Great Lakes - Upper St. Lawrence populations)	<i>Acipenser fulvescens</i>	END	END	No status	Generally found in the shallow areas of lakes or larger rivers, moving into smaller rivers to spawn. Usually found at depths of 5 -10 m and are in areas where water velocity does not exceed 70 cm/sec (COSEWIC, 2017b).	No records of the Lake Sturgeon associated with the St. Andrew's PSW according to DFO and SSEA St. Andrew's Lake Wetland Evaluation. Species not expected to occur.
Least Bittern	<i>Ixobrychus exilis</i>	N/A	THR	THR	Breed strictly in marshes of emergents (usually cattails) that have relatively stable water levels and interspersed areas of open water (COSEWIC, 2009b).	Marsh component of the St. Andrew's PSW complex does not occur within 120m of the subject property according to SSEA (2004). Species not expected to occur in study area.
Little Brown Myotis	<i>Myotis lucifugus</i>	END	END	END	Forests and regularly aging human structures as maternity roost sites. Regularly associated with attics of older buildings and barns for summer maternity roost colonies. Overwintering sites are characteristically mines or caves (MNR, 2014) (COSEWIC, 2013c).	Key habitat requirements for the species (<i>e.g.</i> , forest with large trees suitable for roosting) are found in the study area. The residential dwelling on the property is well maintained and occupied, and not considered suitable roosting habitat. No caves for hibernacula were associated with the property. Considered further with respect to woodlands. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Massasauga (Great Lakes - St. Lawrence population)	<i>Sistrurus catenatus</i>	THR	THR	THR	In Georgian Bay, Massasaugas use bedrock barrens, conifer swamps, beaver meadows, fens, bogs, and shoreline habitats. On the upper Bruce Peninsula, forested habitats are used during hibernation and open, wetland, and edge habitat with canopy closure <50% in mid-late summer (COSEWIC, 2012d).	Species record occurs within the study area according to MNR NHIC 1x1km squares 17NK8660, 17NK8559, 17NK8460, 17NK8561, 17NK8461, 17NK8459, 17NK8560, 17NK8661, AND 17NK8659; and potential suitable habitat occurs in the study area. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Monarch	<i>Danaus plexippus</i>	N/A	SC	END	Breeding habitat is confined to sites where milkweeds, the sole food of caterpillars, grow. Milkweeds grow in a variety of environments, including meadows in farmlands, along roadsides and in ditches, open wetlands, dry sandy areas, short and tall grass prairie, river banks, irrigation ditches, arid valleys, and south-facing hills (COSEWIC, 2016b).	No milkweed observed in the study area.

Common Name	Species Name	SCA ²	COSSARO ³	SARA	Key Habitats Used By Species ¹	July 2026 Addendum Assessment
Northern Myotis	<i>Myotis septentrionalis</i>	END	END	END	Maternity roost sites are generally located within deciduous and mixed forests and focused in snags including loose bark and cavities of trees. Overwintering sites are characteristically mines or caves (COSEWIC, 2013c).	Key habitat requirements for the species (<i>e.g.</i> , forest with large trees suitable for roosting) are found in the study area. The residential dwelling on the property is well maintained and occupied, and not considered suitable roosting habitat. No caves for hibernacula were associated with the property. Considered further with respect to woodlands. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Northern Map Turtle	<i>Graptemys geographica</i>	N/A	SC	SC	Inhabits rivers and lakes where it basks on emergent rocks, banks, logs and fallen trees. Prefer shallow, soft-bottomed aquatic habitats with exposed objects for basking (COSEWIC, 2012e).	Species record occurs in proximity to study area according to MNR NHIC 1x1km square 17NK8461 and is associated with the Georgian Bay shoreline. Species not expected to occur within the study area.
Olive-sided Flycatcher	<i>Contopus cooperi</i>	N/A	SC	THR	Natural forest openings, forest edges near natural openings (such as wetlands) or open to semi-open forest stands. Occasionally human made openings (such as clear cuts). Presence of tall snags and residual live trees is essential (COSEWIC, 2018d).	Key habitat requirements for the species (<i>e.g.</i> , forests near wetlands) are found in the study area. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Red-headed Woodpecker	<i>Melanerpes erythrocephalus</i>	N/A	END	END	Occurs in open deciduous forests, particularly those dominated by oak and beech, groves of dead trees, floodplain forests, orchards, cemeteries, savannas and savanna-like grasslands. Although the species occupies a range of habitat types, key habitat is characteristically composed of woodlands where tall trees are of large circumference (i.e.mature cover) and are at a low density. A high density of snag trees is also an indicator of key habitat types (COSEWIC, 2018e).	Although MNR NHIC databases includes records of Red-headed Woodpecker within 1km of the study area (squares 17NK8460, 17NK8660, 17NK8659), key habitat requirements for the species (<i>e.g.</i> , open forests) are not found in the study area. Species not expected to occur.
Short-eared Owl	<i>Asio flammeus</i>	THR	THR	SC	A wide variety of unforested habitats are used, including grasslands, fallow pastures, and occasionally fields planted with row-crops (COSEWIC, 2021b).	Key habitat requirements for the species (<i>e.g.</i> , pastures) are not found in the study area. Species not expected to occur.
Silver-haired Bat	<i>Lasionycteris noctivagans</i>	END	END	Not Listed	Roosting by Silver-haired Bats occurs under bark and in the cavities of trees, therefore, they rely on large, decaying trees (deciduous and coniferous). Deciduous species (<i>Populus spp.</i>) often have characteristics that make them ideal as roost sites, particularly in older forests. Can utilize old woodpecker cavities. May occasionally roost in buildings, especially during migration (COSEWIC, 2023)	Key habitat requirements for the species (<i>e.g.</i> , mature trees) are found in the study area. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Snapping Turtle	<i>Chelydra serpentina</i>	N/A	SC	SC	Habitat is characterized by slow-moving water with a soft mud bottom and dense aquatic vegetation. Often located in ponds, sloughs, shallow bays or river edges and slow streams, or areas combining several of these wetland habitats (COSEWIC, 2008).	Although MNR NHIC databases includes records of Snapping Turtle within 1km of the study area (squares 17NK8660, 17NK8559, 17NK8560, 17NK8659). Key habitat requirements for the species (<i>e.g.</i> , wetland) are found in the study area. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Tri-colored Bat	<i>Perimyotis subflavus</i>	END	END	END	Maternity roost sites include forests and modified landscapes (barns or human-made structures). Overwintering sites include mines and caves (COSEWIC, 2013c).	Key habitat requirements for the species (<i>e.g.</i> , forest with large trees suitable for roosting) are found in the study area. The residential dwelling is well maintained and occupied and not considered suitable roosting habitat. No caves for hibernacula were associated with the property. Considered further with respect to woodlands. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Wood Thrush	<i>Hylocichla mustelina</i>	N/A	SC	THR	Found in moist, deciduous hardwood or mixed stands, often previously disturbed, with a dense deciduous undergrowth and with tall trees for singing perches (COSEWIC, 2012f).	Species record occurs within proximity of the property according to NHIC 1x1km squares 17NK8561, 17NK8661, and 17NK8660; and habitat for the species occurs in the study area. Following a review of the current legislative framework under the SCA and SARA, the conclusions and recommendations presented in the original Environmental Impact Study remain unchanged. With the implementation of the recommended mitigation measures, the proposed development is not expected to result in a negative impact to this species or contravene the SCA or SARA.
Yellow Rail	<i>Coturnicops noveboracensis</i>	N/A	SC	SC	Nest in wet marshy areas of short grass-like vegetation. The habitat must remain wet throughout the breeding season (COSEWIC, 2009c).	Marsh component of the St. Andrew's PSW complex does not occur within 120m of the subject property according to SSEA (2004). Species not expected to occur in study area.

¹ Habitat as outlined within the MNR's Species at Risk in Ontario website files (<https://www.ontario.ca/environment-and-energy/species-risk-ontario-list>), or Species Specific COSEWIC Reports referenced in this document.

Species at Risk in Ontario List (November 24, 2024)

² Species listed as Threatened or Endangered are protected by the Species Conservation Act, 2025.

³ COSSARO (Committee on the Status of Species at Risk in Ontario) continues to provide scientific assessment and classification of species at risk in Ontario under the Species Conservation Act (SCA). Species classified as Special Concern are recognized as species that may become threatened or endangered due to identified threats and biological characteristics; however, these species are not currently afforded direct protection under the SCA.

Severn Sound Environmental Association (SSEA). 2004. St. Andrew's Lake Wetland Evaluation.
Best, T., and J. Jennings. 1997. Mammalian Species, *Myotis leibii*. The American Society of Mammalogists. No. 547, pp. 1-6, 5 figs.
Cadman, M., D. Sutherland, G. Beck, D. Lepage and A. Couturier. 2007. Atlas of the Breeding Birds of Ontario 2001-2005. Bird Studies Canada, Environment Canada, Ontario
COSEWIC. 2008. COSEWIC assessment and status report on the Snapping Turtle *Chelydra serpentina* in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. vii + 47 pp.
COSEWIC. 2009a. COSEWIC assessment and update status report on the Whip-poor-will *Caprimulgus vociferus* in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. vi + 28 pp.
COSEWIC. 2009b. COSEWIC assessment and update status report on the Least Bittern *Ixobrychus exilis* in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. vi + 36 pp.

Common Name	Species Name	SCA ²	COSSARO ³	SARA	Key Habitats Used By Species ¹	July 2026 Addendum Assessment
COSEWIC. 2009c. COSEWIC assessment and status report on the Yellow Rail <i>Coturnicops noveboracensis</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. vii + 32 pp.						
COSEWIC. 2010. COSEWIC assessment and update status report on the Bobolink <i>Dolichonyx oryzivorus</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. vi + 42 pp.						
COSEWIC. 2011a. COSEWIC assessment and update status report on the Barn Swallow <i>Hirundo rustica</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. ix + 37 pp.						
COSEWIC. 2011b. COSEWIC assessment and update status report on the Eastern Meadowlark <i>Sturnella magna</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. x + 40 pp.						
COSEWIC. 2011c. COSEWIC assessment and update status report on the Henslow's Sparrow <i>Ammodramus henslowii</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. x + 37 pp.						
COSEWIC. 2012a. COSEWIC assessment and status report on the Eastern Musk Turtle <i>Sternotherus odoratus</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xiii + 68 pp						
COSEWIC. 2012b. COSEWIC assessment and status report on the Eastern Ribbonsnake <i>Thamnophis sauritus</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xii + 39 pp.						
COSEWIC. 2012c. COSEWIC assessment and status report on the Eastern Wood-pewee <i>Contopus virens</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. x + 39 pp.						
COSEWIC. 2012d. COSEWIC assessment and update status report on the Massasauga <i>Sistrurus catenatus</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xiii + 84 pp.						
COSEWIC. 2012e. COSEWIC assessment and status report on the Northern Map Turtle <i>Graptemys geographica</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xi + 63 pp.						
COSEWIC. 2012f. COSEWIC assessment and status report on the Wood Thrush <i>Hylocichla mustelina</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. ix + 46 pp.						
COSEWIC. 2013a. COSEWIC assessment and update status report on the Bank Swallow <i>Riparia riparia</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. ix + 48 pp.						
COSEWIC. 2013b. COSEWIC assessment and status report on the Grasshopper Sparrow pratensis subspecies <i>Ammodramus savannarum pratensis</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. ix + 36 pp.						
COSEWIC. 2013c. COSEWIC assessment and update status report on the Little Brown Myotis <i>Myotis lucifugus</i> , Northern Myotis <i>Myotis septentrionalis</i> and Tri-colored Bat <i>Perimyotis subfalvus</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xxiv + 93 pp.						
COSEWIC. 2016a. COSEWIC assessment and status report on the Blanding's Turtle <i>Emydoidea blandingii</i> , Nova Scotia population and Great Lakes/St. Lawrence population, in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa.						
COSEWIC. 2016b. COSEWIC assessment and status report on the Monarch <i>Danaus plexippus</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xiii + 59 pp.						
COSEWIC. 2017a. COSEWIC assessment and status report on the Butternut <i>Juglans cinerea</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xiii + 74 pp.						
COSEWIC. 2017b. COSEWIC assessment and status report on the Lake Sturgeon <i>Acipenser fulvescens</i> , Western Hudson Bay populations, Saskatchewan-Nelson River populations, Southern Hudson Bay-James Bay populations and Great Lakes-Upper St.						
COSEWIC. 2018a. COSEWIC assessment and status report on the Black Ash <i>Fraxinus nigra</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xii + 95 pp.						
COSEWIC. 2018b. COSEWIC assessment and status report on the Chimney Swift <i>Chaetura pelagica</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. vii + 49 pp.						
COSEWIC. 2018c. COSEWIC assessment and status report on the Common Nighthawk <i>Chordeiles minor</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xi + 50 pp.						
COSEWIC. 2018d. COSEWIC assessment and status report on the Olive-sided Flycatcher <i>Contopus cooperi</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. ix + 52 pp.						
COSEWIC. 2018e. COSEWIC assessment and status report on the Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xii + 60 pp.						
COSEWIC. 2020. COSEWIC assessment and status report on the Canada Warbler <i>Wilsonia Canadensis</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xi + 54 pp.						
COSEWIC. 2021a. COSEWIC assessment and status report on the Five-lined Skink <i>Eumeces fasciatus</i> , Carolinian population and Great Lakes/St. Lawrence population in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xvi + 61						
COSEWIC. 2021b. COSEWIC assessment and status report on the Short-eared Owl <i>Asio flammeus</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xiii + 69 pp.						
COSEWIC. 2023. COSEWIC assessment and status report on the Hoary Bat (<i>Lasiurus cinereus</i>), Eastern Red Bat (<i>Lasiurus borealis</i>) and Silver-haired Bat (<i>Lasionycteris noctivagans</i>) in Canada. Ottawa. xxi + 100 pp.						
Ministry of the Environment, Conservation and Parks (MECP). 2026. Species at Risk in Ontario (https://www.ontario.ca/page/species-risk-ontario)						
Ministry of Natural Resources (MNR). 2014. Eastern Small-footed Bat. Queen's Printer for Ontario. https://www.ontario.ca/environment-and-energy/eastern-small-footed-bat						



June 19, 2026

Patrick Townes
113 Collier Street
Barrie, Ontario
L4M 1H2

via email: ptownes@mhbcplan.com

RE: 1st Submission Comments Consent B1/2026 1043 Pine Grove Road

Please find the following comments regarding the Consent B1/2026 concerning 1043 Pine Grove Road.

1. Consent Application Form
 - a. No comments.
2. Environmental Noise Report prepared by Jade Acoustics dated February 2, 2026
 - a. The last paragraph on page 3 should replace the word "insignificant" with "significant".
3. Planning Justification Report prepared by MHBC dated May 2026
 - a. No comments.
4. Scoped Environmental Impact Study prepared by Azimuth Environmental Consulting Inc. dated January 2026.
 - a. See Attachment #1 – SSEA Peer Review.
5. General Comments
 - a. Septic Feasibility Report to be provided as condition of Consent.

Please revise the submission materials accordingly. If you have any questions regarding this matter or wish to discuss these comments in detail, please contact the undersigned by email otaylor@penetanguishene.ca or by phone at 705-549-7453 ext. 251.

THE CORPORATION OF THE TOWN OF PENETANGUISHENE

Owen Taylor,
Planner

ATT #1 – SSEA Peer Review

cc: Andrea Betty, Director of Planning and Community Development





Severn Sound Environmental Association

489 Finlayson St, PO Box 460, Port McNicoll ON L0K 1R0

Phone: (705) 534-7283 | Website: www.severnsound.ca

Email: mhudolin@severnsound.ca

June 4, 2026

Owen Taylor, Planner
Town of Penetanguishene
10 Robert Street West
PO Box 5009
Penetanguishene ON L9M 2G2

To Owen Taylor,

RE: EIS Review – 1043 Pine Grove Rd, Town of Penetanguishene

In response to the Town's request, Severn Sound Environmental Association (SSEA) has reviewed the Environmental Impact Study (EIS) for the subject lands, prepared by Azimuth Environmental Consulting Inc. (Azimuth), dated January 2026.

The EIS states that the *“proposed development involves the severance of an approximate 0.12ha lot on the west side of the property. . . and the construction of a single detached dwelling, driveway, and accessory structures. The proposed development envelope comprises the entire proposed severed lot”* (section 6.0).

The SSEA offers the following natural heritage comments on the proposal and the EIS. Note: these comments only relate to natural heritage, and do not cover engineering or other disciplines or studies that may be relevant.

1. The EIS references Species At Risk (SAR) and the provincial Endangered Species Act (ESA), which was in force at the date of the report but has since been repealed and replaced by the Species Conservation Act (SCA). The EIS states that *“Information related to SAR may have to be revised/updated as new information is released by the province”* (section 2.2) and that *“A review of the [SAR] assessment provided in this report by a qualified person should be sufficient to provide appropriate advice at the time of the onset of future site works”* (section 8.1). The SSEA agrees with these statements and the Town should require the preparation of an EIS Addendum or SAR Memo to confirm consistency with the current SAR legislative framework and policy.
2. Section 3.0 of the EIS describes the study approach, including background information review and the field visit in 2024 in support of the report, and includes the date and weather conditions, and methods of data collection. The background data sources that were accessed were appropriate, and the timing,

weather conditions and protocol used for documenting Ecological Land Classification of vegetation communities, wildlife observations, and SAR screening for the subject property are acceptable.

3. The EIS confirms that the subject lands do not contain Significant Valleylands (section 4.7) or Fish Habitat (section 4.10). Based on the findings of the EIS, the SSEA agrees that the site does not contain these features.
4. The EIS identified the St. Andrew's provincially significant wetland (PSW) "*within the study area, approximately 45m from the subject property*" (section 4.5) and that the feature is "*direct fish habitat*" (section 4.10). Further, the EIS identified that the regionally significant Penetang Lake Life Science Area of Natural and Scientific Interest (ANSI) "*occurs on adjacent lands approximately 20m from property boundary at its closest point*" (section 4.9). Based on background mapping and the findings of the EIS, the SSEA agrees with these statements.
 - a. The EIS states that there will be no disturbance within 30 m of either of these two features, and that, with mitigation as outlined in the EIS, "*there is no expectation that the proposed development will result in a negative impact*" on St. Andrew's PSW (section 7.2) and its fish habitat (section 7.6), or Penetang Lake ANSI (section 7.5). Based on the findings of the EIS and given that the proposed lot would be generally in line with adjacent land use and development envelopes, the SSEA accepts this conclusion. See 8 below for additional comments on mitigation measures.
5. The EIS discusses Significant Woodlands with respect to the subject property, and notes that woodland in the study area has Significant Woodland designation in the Town's Official Plan.
 - a. The EIS indicates that "*For the purpose of this assessment, the FOMM9 community is considered Significant Woodland in the study area*" but states that, due to development and vegetation clearing on adjacent lands "*the WOMM3 woodland is not considered significant*" (section 4.6). The SSEA agrees that woodland community WOMM3 does not currently meet provincially recommended criteria for significant woodland.
 - b. The EIS states that "*The proposed development will not result in direct removals of Significant Woodland, nor will any portion of the property be subject to disturbance within 30m of Significant Woodland. Providing that conformance is demonstrated for environmental considerations and mitigation described in Section 8 below, there is no expectation that the proposed development will result in a negative impact upon Significant Woodland*" (section 7.3). Based on the findings of the EIS, the SSEA agrees with this statement. See 8 below for additional comments on mitigation measures.
6. The EIS included a species at risk (SAR) screening, including consideration of the potential for Threatened or Endangered species as well as Special Concern species or their habitat in the study area.

- a. Vegetation: The EIS indicates that *“No plant species considered Endangered or Threatened were identified during the site investigation. Further, no provincially rare species were observed during the field program. None of the vegetation communities or species documented are of federal or provincial conservation concern”* (section 4.2).
 - b. Wildlife: Section 7.1 of the EIS identified that *“St. Andrew’s PSW is considered potential habitat for Blanding’s Turtle”*, that there is potential for endangered bats, but that trees/woodland in the area of the proposed severance are *“poor quality roosting habitat”*, and further that *“The adjacent St. Andrew’s PSW may provide habitat for Massasauga at various life stages. . . [however] there is no Massasauga protected habitat on the property as per the updated ESA definitions”*. The EIS states that *“Providing that conformance is demonstrated for environmental considerations and mitigation described in Section 8 below, there is no expectation that the proposed development will result in a negative impact to Endangered bats. . . Blanding’s Turtle or the habitats upon which they depend. . . the proposed development is not anticipated to isolate or further prevent the movement of Massasauga within the study area”* (section 7.1). As noted in comment 1 above, the Town should require the preparation of an EIS Addendum or SAR memo to confirm consistency with the current SAR legislative framework and policy. See 8 below for additional comments on mitigation measures.
7. The EIS included an assessment of the potential of the subject property and adjacent lands to function as significant wildlife habitat (SWH); as outlined in section 7.4, candidate SWH types were treated as confirmed SWH.
 - a. Generally, bat maternity habitat for SAR bats overlaps with SWH for non-SAR bat species; see 6b above for comments on bat habitat.
 - b. For SWH types that are associated with wetland habitat, the EIS states that *“the proposed development will occur a minimum of 30m from St. Andrew’s PSW”* (section 7.4.2) and that, with mitigation as outlined in the EIS, *“there is no expectation that the proposed development will result in a negative impact”* on these SWH types (section 7.4.2 and reptiles discussed in section 7.4.3). Based on the findings of the EIS, the SSEA agrees with this statement. See 8 below for additional comments on mitigation measures.
 - c. The EIS identified the potential for four Special Concern bird species, noting that key habitat is not within the proposed development *“nor will disturbance occur within 30m of potential habitat”* and that, with mitigation as outlined in the EIS *“no negative impact to . . . these species are anticipated as a result of the proposed development”* (section 7.4.3). Based on the findings of the EIS, the SSEA agrees with this statement. See 8 below for additional comments on mitigation measures.
8. The EIS contains recommended mitigation measures in section 8.0, including but not limited to: species at risk considerations, vegetation clearing timing

restrictions to protect bats and breeding birds; installation of erosion and sediment controls (ESC) prior to any construction; use of fencing to demarcate the limit of development and protect adjacent natural features. Generally, the recommendations in the EIS should be accommodated in the detailed design stage and construction scheduling, with the following additional considerations:

- a. ESC/fencing should be consistent with Provincial reptile and amphibian exclusion fencing Best Practices (e.g., <https://www.ontario.ca/page/reptile-and-amphibian-exclusion-fencing> or successor documents).
- b. The SSEA supports tree cutting restrictions to avoid harming breeding birds or their nests, as well as bats and other wildlife that may be utilizing woodland/treed habitat. In addition to the Migratory Birds Convention Act (MBCA) that protects migratory birds, the Fish and Wildlife Conservation Act (FWCA) protects other species of wildlife, including early nesting, non-migratory birds such as owls and hawks that can be breeding in winter. It should be noted that property owners are responsible for ensuring that an activity being undertaken by them or for them does not contravene any applicable legislation (e.g., Species Conservation Act, MBCA, FWCA) or local regulations (e.g. tree cutting/forest conservation By-laws) and are responsible for obtaining any required permits/clearances/approvals or adhering to best practices.
- c. Equipment and vehicles should be inspected and cleaned prior to entering the site to prevent spread of invasive species (e.g., https://www.ontarioinvasiveplants.ca/wp-content/uploads/2016/07/Clean-Equipment-Protocol_June2016_D3_WEB-1.pdf).

The proposed lot severance and development is largely in keeping with adjacent land use and development envelopes. Provided that consistency with the current SAR legislative framework and policy is confirmed, and with implementation of mitigation measures identified in the EIS and as noted above, the SSEA accepts the conclusion of the EIS that “*environmental conditions are not limiting to the proposed lot severance and development of a single detached dwelling, driveway, and accessory structures*” (section 9.0).

If you have any questions, please contact the undersigned.

Sincerely,



Michelle Hudolin
Manager Watershed Resilience

CC: Andrea Betty, Director of Planning & Community Development
Melissa Carruthers, SSEA Manager Source Water Protection – RMO/RMI