

27 April 2022

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

By E-mail

Mr. Taylor,

Re: 1230 Sandy Bay Rd, Penetanguishene - EIS Revision

This letter is in regard to the ~4 hectare (ha) property located at 1230 Sandy Bay Road in the Town of Penetanguishene, referred to hereafter as the "Gilwood Property", or simply the "Property".

This letter accompanies the current revised version of the Environmental Impact Study (EIS) report¹ that was originally submitted in November 2021 in support of an application for consent for the creation of 5 new lots from the Gilwood Property. The EIS has been revised primarily in consideration of comments provided in written correspondence from the Severn Sound Environmental Association (SSEA) pertaining to the first EIS submission. The revised EIS also reflects discussions and observations during the meeting at the Gilwood Property on 12 April 2022.

Following are brief summaries of key EIS report changes, in the order of comment presentation in the most recent correspondence from SSEA².

Comment #1 - re survey timing and conditions

The EIS report has been updated (see Section 2.2) to provide more information on the timing and rationale for various EIS monitoring efforts. This includes a confirmation that focused amphibian monitoring was NOT conducted due to an absence of standing water in the wetland area, as confirmed during the site meeting in April 2022.

Comment #3 - re watercourse and wetland surveillance

Additional spring-time monitoring of the wetland and watercourse was completed in April, confirming general assumptions about flow and the assumption that there is no meaningful springtime presence of standing water in the wetland feature.

¹ Environmental Impact Study - Gilwood Farms Inc. Prepared for Gilwood Farms Inc. by Neil Morris, Consulting Ecologist. 20 November 2021. Report Ref# 21-18.1

² Letter from Michelle Hudolin (Biologist, SSEA) to Owen Taylor (Planner, Town of Penetanguishene).05 April 2022. Re: Application for Consent - 1230 Sandy Bay Road, Part Lot 14, Conc. 3, Town of Penetanguishene.

Reference: 1230 Sandy Bay Road - EIS Revision

The EIS Report has been revised (see Section 6.4) to make explicit reference to the status of the wetland within the Gilwood Property as a *Coastal Wetland*. The report now includes discussion regarding adherence to PPS policy 2.1.5, under which no development or site alteration would be permitted within the wetland feature unless it is demonstrated that there will be no negative impacts on the wetland or its ecological functions. The EIS assesses the impacts to the wetland in question, and concludes that residential lots could be established without adverse effects on the wetland.

Comment #4 - re ELC Mapping;

The EIS report has been revised to include figures as suggested by SSEA, including ELC mapping (Figure 2) and mapping of specific features of relevance such as candidate SWH elements and a 30-m stream setback (Figure 3). The discussion of vegetation communities (Section 4.1) has been modified to reflect the new ELC mapping.

Comment #5 - re Black Ash

The report has been updated to reflect the latest regulatory status and prohibitions in regards to Black Ash. No other changes have been made.

Comment #6 - re Birds (Table 3);

Table 3 of the EIS report has been modified to identify which species were observed only on adjacent lands and to include some information regarding general abundance and distribution within the Property. Table 3 has also been modified to identify the area-sensitive species. Figure 3 has been updated to depict *interior forest*, based on the standard criterion of 100 m from forest edge. It is noted here that the Property does not encompass forest that meets the MNRF's SWH criterion for interior forest (i.e. 200 m from forest edge).

Comment #7 - re bat habitat, and Species at Risk in general

The comment is duly noted. No changes have been made to the EIS report.

Comment #8 - re stream set-back

The EIS report has been revised (see newly added Section 6.3.4) to note the general merit for maintenance of 30-m naturally vegetated set-backs. There is no change in the EIS conclusion that a 15-m setback would not result in any change in water quality or quantity or assumed fish habitat function. However, the report now includes a recommendation to avoid or limit development within 30 m of the watercourse, to the extent feasible. Figure 3 approximately depicts the 30-m setback.

Reference: 1230 Sandy Bay Road - EIS Revision

Comment #9 - re Significant Wildlife Habitat (SWH)

The seep locations were revisited in April 2022 to confirm or refine mapping, and minor adjustments have been made to the mapping of the seep features (see Figure 3). This minor adjustment does not affect the conclusions or recommendations of the report.

The stone foundation found within the Property was subject to additional examination in April 2002 to assess its possible function as a snake hibernaculum site. An expanded discussion of this potential SWH function has been added to the EIS report (see Sections 4.8.4 and 6.3.3) The structure has also been added to Figure 3 and photos have been added to Appendix C.

Based on the available information, there is no confirmed SWH function of the stone foundation, but the feature should be given precautionary consideration in the advancement of planning for the Property..

Comment #10 - re regulations and by-laws

The general recommendation regarding other potentially applicable regulations and by-laws is duly noted. No changes have been made to the EIS report in this context.

Comment #11 - tree protection measures

No response is required, and no changes have been made to the EIS report. SSEA's recommendations regarding mechanisms to ensure various natural heritage objectives are in keeping with the findings and conclusions of the EIS.

Comment #12 - Stormwater Management

A statement has been added to the report (see Section 6.3.4) recommending that LID controls should be considered and included in an eventual SWM plan, to the extent feasible and practical.

Comment #13 - Surface Water Protection

An explicit recommendation for an appropriate ESC plan has been added to the EIS report (Section 6.3.4).

Closing:

In summary and closing, this letter accompanies the recently revised EIS report for the Gillwood Property, summarizing the changes that have been made to the report in response to the most recent written comment received from the SSEA. The overall conclusion of the EIS, accounting for all noted changes, is that the proposed severance of the Gilwood Property meets policy requirements, and there is no expectation of any negative impacts on natural heritage features or the Natural Heritage System that they comprise.

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Owen Taylor
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If there remain any questions or needs for additional information relating to the EIS report, please do not hesitate to contact me at your convenience

Sincerely,

A handwritten signature in black ink, appearing to read "Neil Morris". The signature is written in a cursive style with a horizontal line at the end.

Neil Morris, Consulting Ecologist
2480 Olde Baseline Rd.
Caledon, ON, L7C 0J3

cc: Martin Kiener (Gilwood Farms Inc.)
Brian Goodreid (Goodreid Planning Group)
Michelle Hudolin (SSEA)

