

August 14, 2023

Eric Challenger
Woodview Golf
65 Northey's Bay Road
Woodview, ON K0L 3E0

Dear Eric Challenger:

Re: Response to Peer Review Comments on the Environmental Impact Study (EIS) for the Woodview Golf Subdivision (Project 2204601)

1. Introduction

Palmer is pleased to provide these responses to the Peer Review comments provided by Stantec Consulting Ltd. (Stantec) on July 10, 2023. Palmer has reviewed the comments and finds them well measured. While detailed commentary is provided, the following comment responses use the summary questions provided in the document; however, the full commentary on each question was considered in these responses.

Due to the scope of the questions, this response is submitted as Addendum to the EIS, and is considered to provide the additional necessary details to provide for a complete submission with respect to the EIS.

2. Study Area

2.1 Comment

While not in the summary comments/questions, Stantec does recommend that what was included as the Study Area be defined.

2.2 Response

The Study Area defined on **Figure 1** included the proposed development area (the golf course lands), which is a subset of the entire subject property. Through the assessment for the EIS, it was found that definition and assessment of natural features needed to extend beyond that Study Area in certain places, and relevant mapping of those is provided on **Figures 2 and 3**. This was found to be needed to provide appropriate setbacks to adjacent natural features from the proposed development, which are provided on **Figure 3**.

3. Information Gathering Form

3.1 Comment

An IGF is recommended to be filed with the MECP in support of the project to determine MECP's acceptance of mitigation measures to maintain conformance with the ESA, 2007. This could be completed post approval but is recommended as a condition.

3.2 Response

Given that the subject consent application will not result in any changes to the uses or activities on the site, the Information Gathering Form (IGF) can be implemented through a future condition of draft plan of subdivision approval. An IGF will be submitted to the MECP at that stage. The EIS will be used to complete the contents of the IGF. As the potential habitats of most identified Species at Risk (SAR) are avoided, including the highest potential habitats for SAR bats – which is abundant in the overall area, it is anticipated that the MECP may not have further comment. Should the MECP require further detail or mitigation, fulfilling these requirements would also be considered a condition of approval.

4. Nightjar Species

4.1 Comment

Discussion regarding nightjar species in the absence of targeted surveys.

4.2 Response

In our professional opinion it is not likely that Whip-poor-will or Common Nighthawk are breeding species within the portion of the property proposed for development. Much, although not all, of this area is either cut lawn or narrow areas of treed forest. Generally, both species are found in larger undisturbed areas, particularly forested areas with natural openings such as rock barrens or undisturbed clearings. The exception is the roof-nesting habitat that Common Nighthawk uses in urban areas, but this habitat is also not present, as large flat commercial or residential building-tops are generally required.

5. Western Chorus Frog – Special Concern Species

5.1 Comment

While not in the summary comments, the review notes that there is potential for Western Chorus Frog on the property, as April amphibian surveys were not completed, which may have found that early calling species. Also, that the stormwater management pond may provide habitat for this species.

5.2 Response

This species habitat is considered in the assessment of Significant Wildlife Habitat (SWH) for amphibians. The most ideal habitat is the SAM1-4/OAO habitat to the east of the Study Area (**Figures 2 and 3**). The SWM pond feature is anthropogenic, and does not present ideal habitat features, due to regular maintenance and absence of habitat cover features (e.g., logs, trees, boulders). Therefore, it is not considered to be SWH for Chorus Frog.

However, the SWM pond is being retained as part of the development. With the general restoration plans recommended in Section 6, the SWM pond would be retained and enhanced as habitat for this species.

6. Impacts and Improvements to the SWM Pond

6.1 Comment

Discussion on the potential impacts/improvements may occur to the SWM pond as a result of the proposed development and/or if mitigation measures are required.

6.2 Response

The SWM pond is being retained as part of the development. Construction of lots and roads may increase human activity, sediments, and hard surfaces adjacent to the pond. However, as estate lots, these additional pressures are considered to be incremental. The SWM pond is potential habitat to amphibians and other wildlife, though as an anthropogenic feature (Section 4.2.1 of the EIS), it is currently maintained as part of the golf course. Thus, it's vegetative cover is somewhat limited, and is removed from other natural features. Enhancement of the SWM pond would improve the area above current conditions.

A restoration plan for the SWM Pond in Block 2 is recommended to be developed at the Draft Plan Approval stage. As guiding concepts, the following recommendations should be used to develop the restoration plan:

- 1) The pond should be evaluated for means to maintain water quality, including appropriate Dissolved Oxygen (DO) levels, and means to control sediments and deleterious materials.
- 2) Habitat structures such as logs and boulders should be introduced into the pond to provide habitat structures for amphibians and turtles.
- 3) A vegetation planting plan should be developed that fits with SWM pond operation, with the objective of providing *natural, self-sustaining vegetation*. This plan should include trees, shrubs and an appropriate ground cover seed-mix. In-water species should also be considered.
- 4) The planting plan should look to extend the naturalized portions of Block 2, including an extension to the proposed Golden-winged Warbler habitat in Block 3 (**Figure 3**). Ultimately, this extension will provide an enhanced habitat corridor to the adjacent natural system to the east of the Study Area.

7. Ephemeral Pond Inclusions

7.1 Comment

Provide context to why the Ephemeral Pond Inclusions did not appear to have been provided a VPZ.

7.2 Response

Examination of **Figure 2** (Existing Environmental Conditions) shows that the Ephemeral Pond Inclusions fall completely within the SWM1-1 White Spruce-Hardwood Mineral Mixed Swamp polygon. The 30 m wetland setback/VPZ on **Figure 3** (Proposed Development) is based on the limit of the SWM1-1 polygon; therefore, the inclusions fall appropriately within that setback.

8. Invasive Species Introduction

8.1 Comment

Provide mitigation measures to avoid the spreading of invasive species identified in the EIA.

8.2 Response

Non-native species and highly invasive species (including Dog-strangling Vine) were noted within the Study Area, and their spread to adjacent natural area should be controlled and avoided. To reduce the potential for invasive species re-establishment in construction-disturbed areas, areas without hard-surfaces in these areas should be seeded as soon as possible. Certified weed-free topsoils and materials should be used to make up any shortfall in fill materials.

In addition, the following construction practices should be implemented as part of the Construction Management Plan.

8.2.1 Construction Equipment

To prevent the spread of invasive species, construction equipment should arrive at the site clean and leave the site clean.

- Before arriving on site, construction equipment should be pressured washed with high-pressure steam-cleaning methods.
- Equipment cleaning stations should be established to ensure that invasive species seeds and other viable plant parts cannot escape in runoff or through other means.
- During construction, equipment used in areas with an abundance of invasive species should be cleaned prior to moving to another portion of the site.
- A high-pressure steam-cleaning should also be completed on vehicles prior to leaving the site.

8.2.2 Equipment Cleaning Stations

Equipment should be cleaned in an area where contamination and seed spread are not possible (or limited) (Ontario Invasive Plant Council, 2013). The site should be:

- Ideally, mud free, gravel covered or a hard surface. If this option is not available, choose a well maintained (i.e., regularly mowed) grassy area.
- Gently sloping to assist in draining water and material away from the vehicle or equipment. Care should be taken to ensure that localized erosion will not be created, and that water runs back into the area where contamination occurred.
- A means of collecting equipment washings and adding them to soils destined for landfills should be integrated into standard construction practices.
- Cleaning stations should be at least 30 m away from any watercourse, water body and natural vegetation.
- Cleaning stations should be large enough to allow for adequate movement of larger vehicles and equipment.

9. Closing

We trust that these responses provide the appropriate context to address the comments to the EIS provided by Stantec. Please feel free to contact me at 647-461-2372 or austin.adams@pecg.ca if you have any questions regarding the review.

Yours truly,

PalmerTM



Austin Adams, M.Sc., EP
Senior Ecologist