



Environmental

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Locations

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Kingston
Barrie
Whitby
Ottawa

Laboratory

Peterborough



February 21, 2025

CAP Norwood Developments Inc.
75 Valleyview Drive
Ancaster, ON L9G 2A6

Attn: Angelo Puglisi

Sent via email to: apug@cogeco.ca

**Re: Environmental Impact Study Peer Review Comment Response - 52
Mill Street, Norwood, Ontario
Cambium Reference: 14288-002**

Cambium Inc. (Cambium) conducted an Environmental Impact Study (EIS) at 42 & 52 Mill Street, Norwood, Ontario, Upper Mill Pond Subdivision. The proposed development involves a Plan of Subdivision, which would consist of approximately 640 units. A Peer Review was conducted by Stantec Consulting Ltd. and issued on June 6, 2024.

Cambium thanks the reviewers for their comments. Reviewer comments and Cambium's responses are provided in the appended Comment Matrix.

Cambium trusts that the information presented above meets the needs of the peer review for this proposed development. If you have any questions or require clarification of the information presented herein, please contact the undersigned at 705-742-7900.

Best regards,

Cambium Inc.

DocuSigned by:

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Tyler Jamieson, M.Sc.
Coordinator - Ecologist

DocuSigned by:

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Robin LeCraw, Ph.D.
Project Manager / Senior Ecologist

TJ/r/
Encl.

Comment Matrix

Cambium Qualifications and Limitations

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Comment Number	EIS Page Reference	Subject	Stantec Comment June 6, 2024	Cambium Response Feb 7, 2025
1	Pg 20, Section 4.4 (Surface Water and Drainage Features); Pg 28, Section 5.4 (Waterbody); Pg 33, Table 6 - PPS Policy Conformity Summary; Figure 1 - Site Location and Policy Areas; Figure 2 - Natural Heritage Features and Ecological Survey Locations	Purpose and Scope of the EIS	The description of the waterbodies within the Study Area was confusing. Naming and/or labelling the waterbodies/wetlands would have assisted the reviewer to be sure of which waterbodies, ponds, etc. the author is referring to. In Section 4.4 (Surface Water and Drainage Features, it indicates: “An unmapped pond feature, a waterbody, is present on adjacent lands and extends just beyond the property boundary onto the northwest portion of the Site.” Then in Section 5.4 (Waterbody) the EIS states: “There is no waterbody or watercourse located on the Site. A pond and waterbody are located on adjacent lands to the west. No direct impacts will occur within the waterbody or pond. The proposed development will maintain a minimum 30 m setback to the pond and waterbody as shown on Figure 3. Potential exists for indirect impacts to the waterbody because of the proposed development and site alteration. Mitigation measures listed in Section 5.3 to protect fish habitat will also protect the ecological form and function of the waterbody. Provided these mitigation measures are implemented, the proposed development is not anticipated to negatively impact the pond or waterbody.” Then in Table 6, the EIS indicates: “No in-water work is proposed within the waterbody. A 30 m setback will be applied to the pond. The SWM Pond will be designed to meet water quality, and quantity.” Figure 1 indicates “Water Area”, and Figure 2 identifies it was “Waterbody/Pond”. It is unclear whether the pond and waterbody is a different feature. Stantec assumes that the terminology has been used interchangeably but further confirmation is recommended.	Acknowledged. Text in the report and figures has been edited to make this more clear.
2	Pg 20, Section 4.4 (Surface Water and Drainage Features)	Key Hydraulic Features	Section 4.4 (Surface Water and Drainage Features) indicates that: “The railway line separates Mill Pond from the Site. No surface water connection to the site was identified during field visits.” However, it was noted in the Drawing B-2 of the Preliminary Stormwater Management Report (Jewell Engineering, December 1, 2023) that there is a culvert that crosses the tracks and connects the waterbody at the western edge of the development with the waterbody across the tracks.	Acknowledged. This culvert was not observed during field investigations. It could be that this feature is buried, or hidden by exisiting vegetation. This will be included in the figures and the text changed.
3	Pg 22, Section 4.6.3 (Mammal	Species at Risk Assessment	Section 4.6.3 (Mammals) of the EIS provided the following description of potentially impacted bat habitat: “The bat maternity roost survey included investigating the vegetated hedgerows for suitable cavity trees. Individual trees that met the criteria were marked with a hand-held GPS unit. The survey revealed one suitable tree located along the southern Site boundary (Figure 2). The Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E states that the certain forest communities (i.e., FOD, FOM, SWD, SWM) are bat maternity colonies if they meet the SWH criteria of >10/ha large diameter wildlife trees. As this single tree was within a hedge row, not a forest, it does not meet the ELC community type to be deemed SWH Bat Maternity Colony.” It’s noted that the cleared trees mentioned in Section 4.2 (Vegetation Communities) may also have acted as SAR bat habitat prior to clearing. Also, the EIS did not identify the barn or other farm buildings as potential bat maternity habitat. Stantec recommends that the barn should be considered as potential maternity habitat and discussed in the EIS if it is to be removed as part of the project.	Acknowledged. The presence of bats in the barn was assessed in additional field investigations June 2024, and documented in an EIS addendum letter dated February 3, 2024.

Comment Number	EIS Page Reference	Subject	Stantec Comment June 6, 2024	Cambium Response Feb 7, 2025
4	Pg 24, Section 4.8.2 (Special Concern Species)	Species at Risk Assessment	Section 4.8.2 (Species Concern Species): indicates “Midland Painted Turtle and Snapping Turtle were observed in the pond on adjacent lands west of the Site. These species rely on aquatic habitats for most of their biophysical requirements. No aquatic habitat is present on the Site that would support the life processes of these species. Nesting surveys were completed on the Site and no turtle nesting was observed on or adjacent to the Site.” This is assumed to be the pond that encroaches onto the subject property and has been awarded the 30 m setback and has some connection with the larger pond on the other side of tracks.	This assumption is correct.
5	Appendix F	Significant Wildlife Habitat	It was noted that the Title of the Table in Appendix F is “Significant Wildlife Habitat Screening - 7E”; however, it was previously noted to be in Ecoregion 6E. Stantec assumes this to be an error and it was assessed as 6E as noted in the EIS.	Acknowledged. This error has been fixed.
6	Pg 22, Section 4.7 (Significant Wildlife Habitat)	Significant Wildlife Habitat	The EIS indicated that no SWH was identified on-site, although the assessment and supporting information was not included in the EIS. Section 4.7 (Significant Wildlife Habitat) of the EIS provided the following information: “Based on our observations during field investigations and the ELC classifications described in Section 0, the Site does not meet the criteria for designation as SWH.” Stantec acknowledges this statement; however, there is a wetland (pond) boarding/within the boundary of the subject property, and since no amphibian surveys were completed, further discussion is recommended on why this would not be considered SWH is recommended for the County. Also, it was noted that turtles were observed in May on the adjacent lands and should be considered as overwintering habitat. Otherwise, due to the ELC communities on-site, this conclusion seems appropriate.	Acknowledged. In Sections 4.6.2, 4.7, and 5.6 we have included discussion regarding amphibian breeding habitat. The reviewer is correct. Based on basking surveys, the pond at the western boundary of the Site should be considered SWH for Overwintering Turtles. Text has been included to that effect in Section 4.6.2, 4.7, and 5.6.
7	Pg 27, Section 5.3 (Fish Habitat)	Impact Assessment and Mitigation Measures	Section 5.3 (Fish Habitat) as part of the impact assessment indicates: “No fish habitat is located on the Site. The pond located on adjacent lands provides direct fish habitat. A 30 m waterbody setback will be applied to this feature to protect fish and fish habitat. It is recommended that the lands on Site within the 30 m setback to the pond be revegetated with native trees and herbaceous plants to enhance the ecological form and function of the setback.” It was noted in the Preliminary Stormwater Management Report (Jewell Engineering, December 1, 2023) that the 30 m buffer is maintained. However, the location of the outlet pipe at the edge of the 30 m buffer, scour protection and/or additional development or temporary disturbance within the buffer is assumed to occur.	Acknowledged. As stated in Section 5.3 , it is anticipated that the final design of the SWM infrastructure will provide sufficient design considerations at the outflow to prevent erosion and changes in water quality within the pond on adjacent lands. Some additional mitigation considerations have been added to Section 5.3.
8	Pg 27, Section 5.3 (Fish Habitat)	Impact Assessment and Mitigation Measures	Section 5.3 also indicates: “Any observed overland drainage channels originating from Site, that may or may not have arisen because of erosion, should be directed to a check dam structure, prior to discharging to off-site areas.” It’s Stantec’s opinion that water discharge from overland drainage should be managed on-site, rather than being allowed to potentially cause erosion and mitigated outside the property if that is the intent of this statement.	This statement is intended to address potential erosion issues during construction, specifically, to avoid the release of un-checked overland drainage from the Site into adjacent lands. As stated in Section 5.3, Cambium has recommended that an ESC Plan be created in tandem with a SWM Plan to mitigate potential issues regarding storm water and erosion both during and after construction.

Comment Number	EIS Page Reference	Subject	Stantec Comment June 6, 2024	Cambium Response Feb 7, 2025
9	Pg 28, Section 5.5 (Habitat of Endangered and Threatened Species)	Impact Assessment and Mitigation Measures	The impact assessment on SARs Section 5.5 (Habitat of Endangered and Threatened Species) provided mitigation measures by avoiding clearing of the trees during the active bat seasons (April 1 to September 30). However, as previously discussed, some consideration should be given to the potential removal of other farm structures within the Site. Stantec recommends that based on the scope of the project, consultation with the Ministry of the Environment, Conservation and Parks (MECP) should occur by filing an information gathering form (IGF) to confirm conformance with the ESA, 2007.	<p>Acknowledged. The presence of bats in the barn was assessed through additional surveys in June 2024 and are documented in an EIS addendum dated July 24, 2024. No SAR bats were detected utilizing the barn. Given the single suitable habitat tree to be removed, and the results of the exit survey of the barn, it was determined that no harm to SAR bats or damage or destruction of their habitat would result from the proposed development, therefore consultation with MECP is not required.</p> <p>It is Cambium's understanding that the Barn was removed in December 2024, in accordance with the recommended mitigation measures.</p>
9	Pg 29, Table 5 (Best Management Practices)	Impact Assessment and Mitigation Measures	Table 5 of the EIS indicated: “Sediment fencing can function as wildlife exclusion fencing. To exclude wildlife from the Site, sediment fencing should be installed around the entire perimeter of the construction area prior to the earlier of May 1 or commencement of Site preparation to keep turtles and snakes from entering the construction area.” Stantec disagrees with the statement that Sediment fencing can function as wildlife fence since the supports for sediment fence and wildlife fencing should be installed on opposite sides. Since Special Concern species are located within 30 m of the proposed development and a construction site likely to act as an attractant for turtle species that turtle fence be established in addition to sediment fence. Also, since SWH for turtles as mentioned above, and candidate SWH for amphibian occurs adjacent to the proposed SWM pond, Stantec recommends that the EIS and/or SWM pond design consider long-term exclusion measures to prevent wildlife from using the SWM facility.	<p>Acknowledged. We have included the recommendation for double-walled silt fence with straw bales in between the layers as exclusion fenceing.</p> <p>Due to the proximity of the adjacent pond and Mill Pond, Cambium feels that the exclusion measures will likely be insufficient in excluding wildlife in the SWM ponds. Fencing may only serve to trap wildlife inside the SWM facility. Partial directional fencing may be considered to deter turtles from moving from the pond to the SWM pond, and direct them back to the existing naturalized features.</p>