

February 3, 2025

BEL 222189

Mr. Anthony DeCarli
Johndec Properties Inc.
PO Box 487
Midland, ON L4R 4L3

via email: anthony.decarli@gmail.com

Re: Comment Response for a Scoped EIS for 1736 Caughey Lane in the Town of Penetanguishene, Simcoe County

Dear Mr. DeCarli:

Beacon Environmental Limited (Beacon) completed a scoped Environmental Impact Study (EIS), dated November 2023, for the property located 1736 Caughey Lane in the Town of Penetanguishene (the Town), in Simcoe County (hereafter the subject property) as a requirement of a proposed consent application.

The EIS concluded that, provided that the recommended mitigation measures are implemented, the proposed removals will not have a negative impact on the natural heritage features or their ecological functions.

This conclusion is based on the definition of “negative impact” found in the Provincial Planning Statement (2024; PPS), and the fact that a relatively small area, less than 0.1%, of a large, contiguous woodland, is proposed for removal and that this small area of removal is at the periphery of the woodland and would not result in negative effects on the woodland habitat.

The large woodland on and extending beyond the subject property boundaries is identified as a significant woodland and supports confirmed significant wildlife habitat (SWH) for area-sensitive woodland birds. Woodlands are ‘significant’ under the PPS if they meet certain criteria set out by the municipality (if applicable) or by the province in the Natural Heritage Reference Manual (2010) such as size, ecological features and functions, recreational or economic value. Area-sensitive woodland bird breeding SWH is defined by interior woodland habitat that is typically mature, greater than 30 ha and at least 200 m from forest edge habitat and studies confirm the presence of listed species of area-sensitive interior forest songbirds.

Both significant woodland and SWH are referenced in Section 4.1.5 of the PPS whereby development and site alteration shall not be permitted unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.

Further, the PPS defines “negative impacts” as,

“degradation that threatens the health and integrity of the natural features or ecological functions for which an area is identified due to single, multiple or successive development or site alteration activities.” (p.48)

The EIS demonstrated that the removal of a small area of significant woodland edge and SWH (i.e., woodland area-sensitive bird breeding habitat) within the subject property, with recommended mitigation measures, would not result in degradation that threatens the health and integrity of these natural features or their ecological functions. Recommended mitigation measures include:

- Site alteration (i.e., removal of trees, clearing, etc.) **should not occur on the subject property from April 1 through August 31**, as this time corresponds to the peak nesting period for the majority of migratory birds and encompasses the breeding season for the species documented on the subject property during the breeding bird surveys;
- The federal *Migratory Birds Convention Act* (1994) and provincial *Fish and Wildlife Conservation Act* protect the nests, eggs and young of most bird species from harm or destruction. As the breeding bird season in central Ontario is generally from April to the end of August, the clearing of vegetation should occur outside of these periods; and
- Coniferous trees should be planted along the new forest edge to mitigate edge effects such as light and wind penetration into the remaining forest.

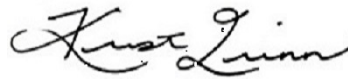
Based on the results and assessments in the scoped EIS and the PPS definitions, Beacon is of the opinion that the proposed development will not have a negative impact on the significant woodland, nor the significant wildlife habitat and complies with the PPS policies, provided that the recommended mitigation measures are implemented.

Prepared by:
Beacon Environmental Ltd.



Geri Poisson, B.A. (Hons.), Dipl. Eco. Restoration
Senior Ecologist,
ISA Certified Arborist (ON-1288A)

Reviewed By:
Beacon Environmental Ltd.



Kristi Quinn, B.E.S., Cert. Env. Assessment,
Principal, Senior Environmental Planner