

Prepared By:



Ecological Compensation Plan

372 Grey Road 21 – West Parcel
Town of The Blue Mountains

Project No. 04-010-2021

July 2026



23 Herrell Ave
Barrie, Ontario
L4N 6T5

July 17, 2026

Rhem Properties Ltd.
Box 87 Clarksburg, Ontario
N0H 1J0

Attention: John Rodgers, Owner

RE: Ecological Compensation Plan – 372 Grey Road 21 (West Parcel), Town of The Blue Mountains
Birks NHC File No. 04-010-2021
P3522 Draft Plan of Subdivision, P3523 Official Plan Amendment, P3524 Zoning By-law Amendment County File 42T-2025-05

Dear Mr. Rodgers,

Thank you for retaining Birks Natural Heritage Consultants, Inc. ('Birks NHC') to undertake the preparation of an Ecological Compensation Plan for the property identified as 372 Grey Road 21 (West Parcel) in the Town of the Blue Mountains, County of Grey. We understand that this plan is being requested in support of an Official Plan and Zoning By-law Amendment and Draft Plan of Subdivision applications for the property due to the proposed removal of 0.58 ha of Significant Woodland habitat.

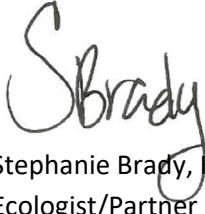
Birks NHC completed an Environmental Impact Study (Birks NHC, 2023), as well as Environmental Impact Study Updates (Birks NHC, 2025a, 2026), and Tree Inventory and Protection Plan and updates (Birks NHC, 2025b, 2026) for the property based on a proposed development plan which would allow for the development of a residential subdivision on the property. Following the recommendations in those reports, this Ecological Compensation Plan addresses proposed Significant Woodland loss that would occur in the development area and details compensation measures to offset that loss while enhancing the ecological function of the retained natural lands.



This report has been prepared to satisfy the requirements of the Town of the Blue Mountains and Grey County and has been prepared in consultation with those agencies.

If you have any questions or concerns regarding this report, please do not hesitate to contact the undersigned.

Birks Natural Heritage Consultants, Inc.



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Ecologist/Partner



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Ecologist/Partner
ISA Certified Arborist ON-1992A



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1 INTRODUCTION

Birks Natural Heritage Consultants, Inc. ('Birks NHC') was retained by Rhemm Properties Ltd. (the 'proponent') to undertake the preparation of an Ecological Compensation Plan for the lands located at 372 Grey Road 21 - West (the 'property') in the Town of The Blue Mountains (the 'Town'), County of Grey ('County').

1.1 PURPOSE

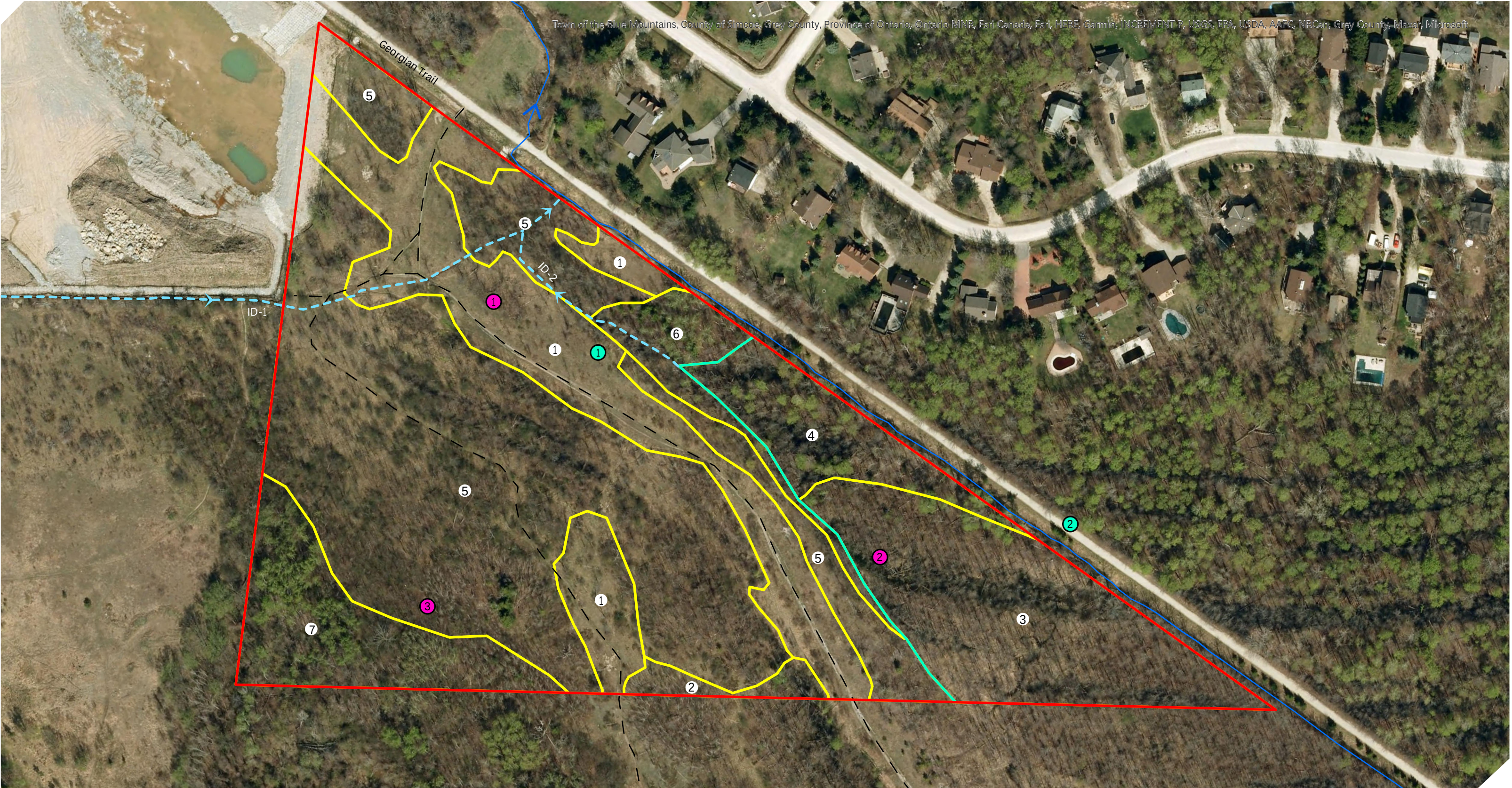
Birks NHC completed an Environmental Impact Study ('EIS'; Birks NHC, 2026) for the proposed development of a residential subdivision on the property as part of an Official Plan and Zoning By-law Amendments and a Draft Plan of Subdivision applications. The EIS was deemed required due to the presence of wetlands, woodlands, and drainage features within and adjacent to the property. The EIS identified that the proposed development would result in the partial removal of a Poplar deciduous forest community in the south-western corner of the property and an area of Ash-hardwood lowland deciduous forest in the southern portion of the property, both of which are part of a feature designated as Significant Woodland.

In accordance with comments received from both the Town and the County staff, compensation for the loss of Significant Woodland would be required in order to demonstrate no negative impacts to the feature. Thus, this Ecological Compensation Plan has been prepared to address natural heritage feature alterations, specifically Significant Woodland loss, and details natural area enhancement and compensation measures to offset woodland loss.

This report has been prepared to satisfy the requirements of review agencies and has been prepared in consultation with County ecology staff. Birks NHC has also considered the County's draft Ecological Offsetting Policy in preparation of this document.

1.2 PROPERTY DESCRIPTION

The 372 Grey Road 21 (West Parcel) property is triangular-shaped and measures approximately 7.0 hectares (ha). The property contains natural woodland, thicket, and wetland conditions, including components of the Silver Creek Provincially Significant Wetland ('PSW') Complex. The property also contains several unsanctioned recreational trails. A mapped watercourse is present along the eastern property limits, which flows north-northwest along the Georgian Trail, eventually crossing the Georgian Trail and flowing north to Georgian Bay. Seasonal drainage features were documented within the property which pass through the north-eastern vegetation communities and across the north-western corner of the property.



372 GREY ROAD 21 - WEST PARCEL

Town of The Blue Mountains

- Property Limit
- Watercourse (Birks NHC/LIO)
- Seasonal Indirect Drainage Feature
- Walking Trail
- Wetland Limit (Birks NHC/Tatham)

- Survey Locations**
- Breeding Bird Survey
 - Amphibian Call Survey

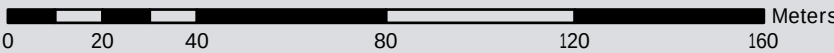
- Vegetation Communities**
- 1) MEGM4-1/Cultural Open Graminoid Meadow
 - 2) FODM7-2 Fresh-Moist Green Ash-Hardwood Lowland Deciduous Forest
 - 3) SWDM2-2 Green Ash Mineral Deciduous Swamp
 - 4) SWDM4-5 Poplar Deciduous Swamp

- 5) THDM2-6 Buckthorn Deciduous Shrub Thicket
- 6) FODM8-1 Fresh-Moist Poplar Deciduous Forest
- 7) FODM3-1 Dry-Fresh Poplar Deciduous Forest

Figure 1: Existing Conditions and Survey Locations



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2 NATURAL HERITAGE FEATURES AND FUNCTIONS

Through the completion of the EIS, the property was determined to contain both confirmed and candidate natural heritage features and functions. The property contains a portion of the Silver Creek PSW, Significant Woodlands and seasonal indirect fish habitat (Birks NHC, 2026). Further, the property potentially provides Significant Wildlife Habitat functions and habitat for Endangered bat species. Potential impacts to those features and functions are assessed and discussed in the EIS, and is summarized below in terms of the natural features:

2.1.1 Silver Creek PSW

The proposed development does not entail any alterations and/or encroachments into the delineated limits of the Silver Creek PSW. Under existing conditions, a servicing corridor is present within the 30 m setback to the limits of the wetland. The proposed development would require re-alignment of the servicing corridor which would be maintained, in part, within the 30 m wetland setback. This corridor would entail both the servicing easement as well as an access road along the length of the corridor. Two drainage outlets are also proposed within the 30 m wetland setback.

No loss of wetland habitat will occur as part of the development application and therefore no wetland compensation is proposed. Notwithstanding, this Ecological Compensation Plan is expected to have a positive impact on the wetland through the management of invasive species and native plantings within the Ash swamp community that has experienced significant die-off due to the Emerald Ash Borer ('EAB') impact to the Ash species.

2.1.2 Watercourses

A permanent unnamed drainage feature borders the northern property limit and has been identified as direct fish habitat. Two additional drainage features were documented within the property, which have been identified intermittent and indirect fish habitat.

A 30 m setback to the permanent drainage feature has been integrated into the Site Plan. No loss of fish habitat is expected to occur as part of the development and therefore no compensation is proposed in relation to watercourses and fish habitat. A minor encroachment is proposed within the 30m setback to the permanent drainage feature, as part of the servicing corridor and access road. This encroachment is not expected to have a negative ecological impact on the feature and thus no additional consideration for watercourses is warranted.

2.1.3 Woodlands

The EIS identified that the proposed development would result in the partial loss of a Poplar deciduous forest community (0.49 ha) in the south-western corner of the property and of Ash-hardwood lowland deciduous forest (0.09 ha) in the southern portion of the property, both of which are part of a feature designated as Significant Woodland. The removals would constitute 0.58 ha out of the 62 ha contiguous woodland feature that extends to the west and south outside of the property boundaries.



The proposed development would also result in the removal of the European Buckthorn shrub thicket community in the centre of the property. The community is comprised of a number of non-native plant species and does not function as habitat for Species at Risk, rare species, or provide Significant Wildlife Habitat functions (Birks NHC, 2026).

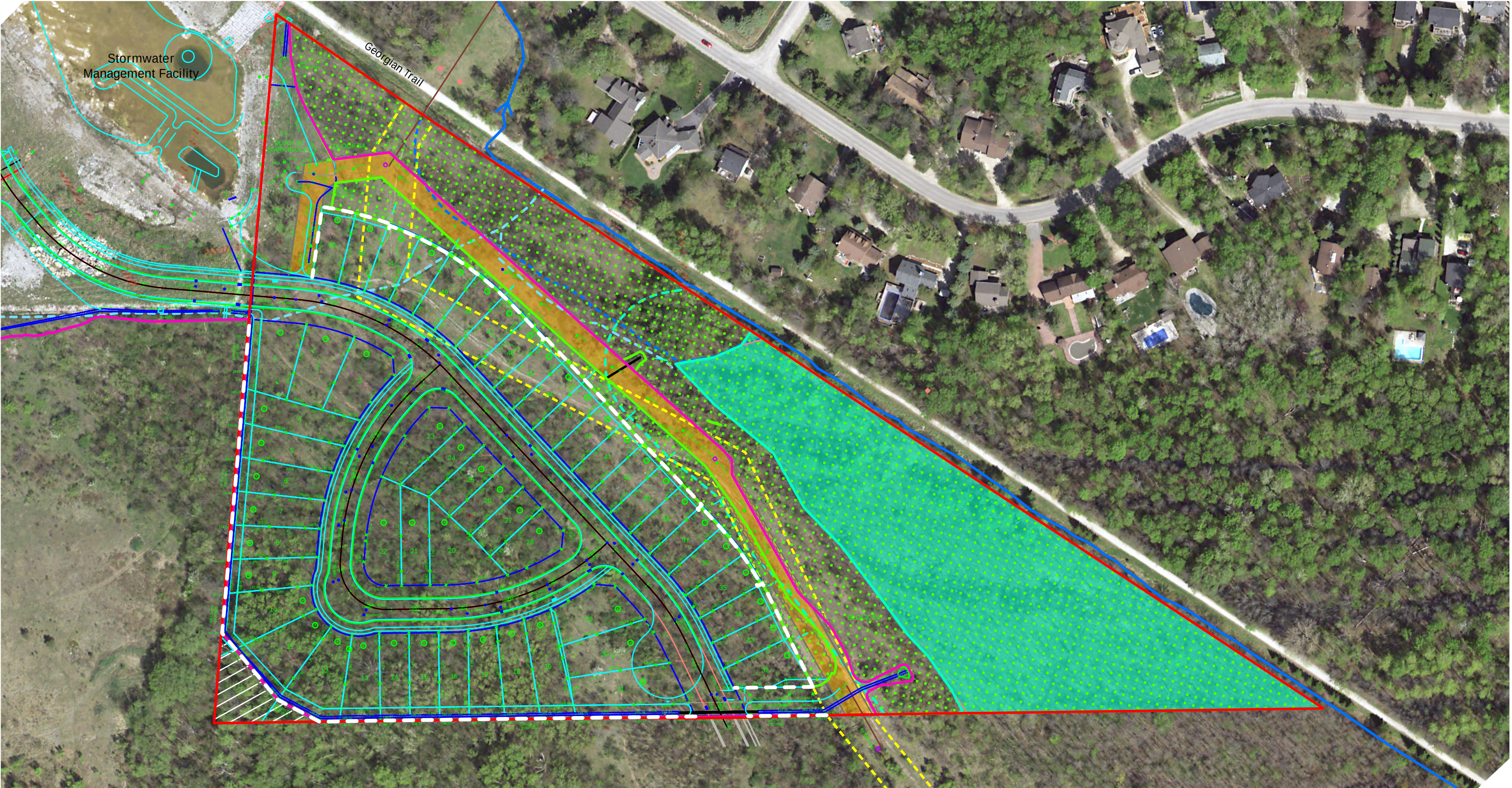
This Ecological Compensation Plan considers woodland removals required for the proposed development, with the ability to protect the remaining swamp and upland forest woodlands on the property and enhance lower quality areas via invasive species management and plantings of native species. This plan provides for European Buckthorn management over an area of 2.6 ha and planting of native tree and shrub specimens within the natural lands of the property, resulting in an overall establishment and enhancement of 2.7 ha of native woodland habitat.

3 PROPOSED SITE PLAN

The proposal involves the creation and development of residential lots as part of a Draft Plan of Subdivision. The Draft Plan includes an access road from the adjacent Eden Oaks development that will cross through the property in a general north-west to south-east direction and a mix of single detached and semi-detached homes (Figure 2). An existing intermittent drainage feature (ID1) will be partly re-aligned along the reach that is present off property, to the west (approximately 130 m), and surface overland flow will be conveyed along the road to the SWMF to the west (Eden Oak Development), out letting in part to the unnamed permanent watercourse along Georgian Trail. Systems for quality and quantity control prior to out letting will be in place prior to reaching the watercourse. Runoff from the northern lots will be directed towards the open space block and allowed to disperse through infiltration (Figure 2).

Servicing for the proposed development will be through public water and sewer systems, the infrastructure for which is already in place (in regard to water). The proposed development would require the re-alignment of the servicing corridor which would be maintained, in part, within the 30 m wetland setback. This corridor would entail both the servicing easement as well as an access road along the length of the corridor. Public use of the servicing easement will be permitted to function as a recreational trail corridor.

A hazard lands designation is present, associated with floodplain and wetland setbacks. Open Space/Park is proposed within the north-western corner of the property, outside of the hazard and wetland designations. A drainage easement will be placed along the western and southern property limits to allow for the construction of drainage infrastructure, directing flows away from the proposed residences.



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PARCEL

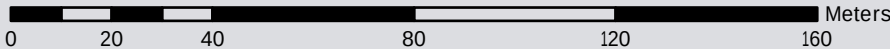
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- | | | | |
|--|------------------------------------|--|---|
| — Property Limit | — Wetland Limit (Birks NHC/Tatham) | — Proposed Limit of Grading (Tatham) | Ecological Compensation Area (Refer to Separate Report) |
| — Watercourse (Birks NHC/Ontario GeoHub) | Wetland Area (1.46 ha) | — Proposed Chainlink Fence (approx.) | Retained Significant Woodland Area (0.07ha) |
| 30m Watercourse Setback | 30m Wetland Setback | Existing Servicing Easement | |
| Seasonal Indirect Drainage Feature | | Proposed Servicing Corridor (Town-owned lands) | |

Figure 2. Proposed Site Plan



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4 ECOLOGICAL COMPENSATION PLAN

The Ecological Compensation Plan aims to achieve “no net loss” and an overall net gain for the natural features of the area. The following provides a proposed action plan that considers the loss of 0.58 ha of Significant Woodland habitat while adding value to and enhancing the maintained natural areas of the property. The Ecological Compensation Plan Overview is presented in Figure 3.

4.1 INVASIVE SPECIES MANAGEMENT

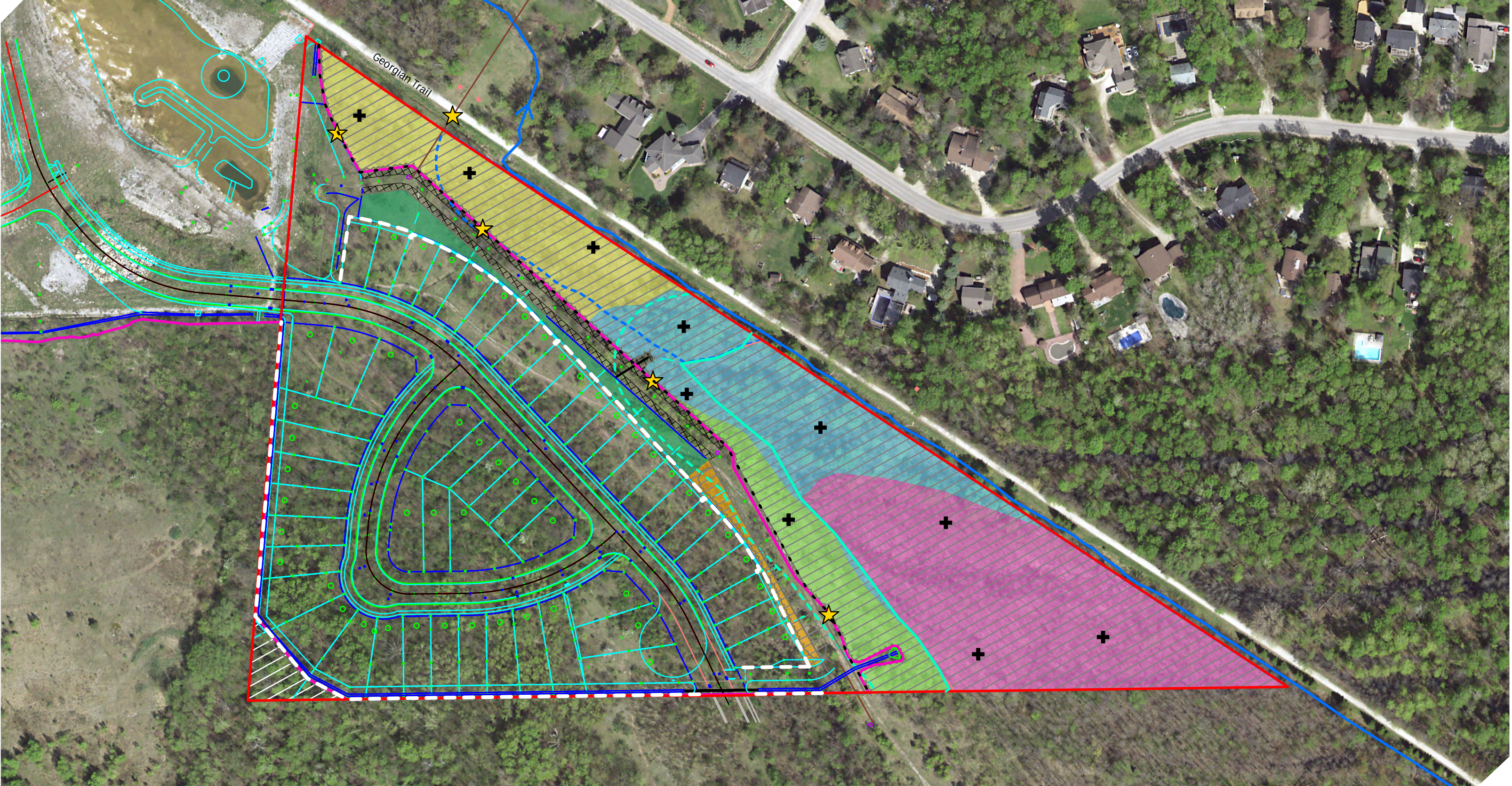
Through the completion of field surveys, including Ecological Land Classification and vegetation surveys completed as part of the EIS (Birks NHC, 2026), all upland treed communities within the property were characterized as containing a dense and thick understory of European Buckthorn, which could reduce the function of those communities in providing wildlife habitat and threaten adjacent natural areas through spread. European Buckthorn was also identified in the Poplar and Ash swamp communities.

European Buckthorn is listed as a ‘noxious’ weed in Ontario (MAFRA, 2022). It thrives in a variety of habitats, germinates quickly and can form dense thickets that prevent the growth of native species. Although the proposed development would result in the removal of the European Buckthorn shrub thicket community in the centre of the property (THDM2-6), retained natural areas in the north-northeastern portion of the property will continue to support European Buckthorn. Management of European Buckthorn through the implementation of this Compensation Plan will therefore significantly reduce the presence of the invasive species on the property and in turn decrease the potential for establishment within adjacent natural lands.

European Buckthorn management activities are to occur in all of the retained natural communities located in the north-northeastern portion of the property, for a total area of 2.6 ha for invasive species management. Management of European Buckthorn often requires multiple years of dedicated management and monitoring. Planting within the invasive species management areas should only take place after 75% or more of the European Buckthorn has been removed. Healthy native trees should be retained in the invasive species management areas to avoid opening the canopy and to aid in buckthorn seedling suppression. Establishment of planted materials will further create competition and shade to prevent European Buckthorn re-establishment and spread. The following sections present various control methods with Section 4.1.5 providing the recommended methods for the management of the invasive species.

4.1.1 Mechanical Control

Mechanical techniques for controlling European Buckthorn are labour intensive, particularly when herbicide treatments are not employed. For European Buckthorn, manual methods include pulling of seedlings/saplings and for larger plants, cutting of the trunk at breast height with follow up cuttings in subsequent years.



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PARCEL

Town of The Blue Mountains

- Property Limit
- Watercourse (Birks NHC/Ontario GeoHub)
- 30m Watercourse Setback
- Wetland Limit (Birks NHC/Tatham)
- 30m Wetland Setback

- Proposed Limit of Grading (Tatham)
- Proposed Chainlink Fence (approx.)
- Proposed Page Wire Fencing (approx.)
- Signage Location

- Retained Significant Woodland Area (0.07ha)
- Invasive Species Management (2.6 ha)
- Monitoring Plot Locations
- Seeding

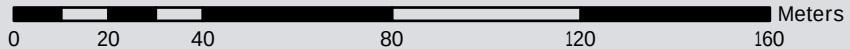
- Compensation Planting Areas (2.7 ha)
- Planting Area A (0.5ha)
 - Planting Area B (0.3ha)
 - Planting Area C (1.1ha)

- Planting Area D (0.63ha)
- Planting Area E (0.15ha)
- Planting Area F (0.06ha)

Figure 3: Ecological Compensation
Plan Overview



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Hand Pulling

When in loose moist soils, young seedlings of European Buckthorn can be hand-pulled or removed with the use of a weed pulling tool, while ensuring the entire seedling and root mass are removed. Larger saplings should be pulled using a sapling puller, allowing more leverage to pull saplings out of the ground with the roots intact. Preferably, branches with berries should be cut in the summer before the berries ripen and fall off; the cuttings and berries should be double bagged and removed off site for disposal. Then the remaining stems can be pulled out in the fall. To limit disturbance and reduce impact on surrounding vegetation, it is recommended that removal take place from mid-October to mid-November, before the ground freezes. Disposal options are provided in Section 4.1.3 of this report.

Cutting/Girdling

For larger European Buckthorn that cannot be easily pulled, the trunks can be cut or girdled in order to weaken the plant. The weakened girdled trees can then be removed easier the following year. Cutting without chemical application (herbicide), however, can lead to multi-stem re-growth and sprouting. To avoid re-growth without the aid of chemical application, a specialized product such as 'Buckthorn Baggies' (www.buckthornbaggie.com) or an equivalent product, can be used to cover the cut tree and kill the plant.

4.1.2 Chemical Control

Chemical control is the most effective method for managing large populations and larger (> 5 cm) European Buckthorn trees. Systemic herbicides are used for buckthorn control due to their design whereby the herbicide is absorbed by the plant, translocated to the roots and prevents re-sprouting.

Foliar application of a systemic herbicide should be restricted to larger populations of smaller trees where pulling is not practical. Foliar herbicide should be applied during late summer or early fall as this timing generally coincides with the reduced activity of native wildlife, as well as dormancy in native vegetation, while European Buckthorn retains green leaves longer than most native plants. Larger trees can be cut and the stumps treated with a systemic herbicide which will be absorbed and actively transferred to the root system, causing damage to the plants. Alternatively, standing stems can be sprayed with a systemic herbicide (basal bark application). The chemical penetrates the bark and kills the tree. These stems should subsequently be cut to ground level once dead.

Herbicide application must be applied by an appropriately licensed professional and in accordance with federal and provincial legislation. Efficacy of herbicide application is to be reviewed and assessed the following growing season to determine if additional treatment is necessary; herbicide is to be applied no more than once a year.

For an up-to-date list of herbicides labelled for European Buckthorn control, visit the Pest Management Regulatory Agency's web site at www.pmr-arla.gc.ca.



4.1.3 Disposal

European Buckthorn branches and berries could be piled and burned on site following safety plans and municipal by-laws (a burn permit from the Town may be required). Cuttings can be also disposed in green waste (compost) or by chipping. However, all fruit must be removed first because composting and chipping trees without prior berry removal can contribute to seed spread. Alternatively, plant material may be brought to a composting facility where high temperatures are reached to kill the plant; disposal at a municipal compost waste facility may be an option.

4.1.4 Operations Prevention Measures

Control of potentially contaminated materials and equipment is recommended to prevent the spread and introduction of invasive species to new locations. This would include inspection and cleaning of all equipment including machinery, vehicles, boots, *etc.* prior to allowing access to the property and prior to leaving the site. Inspection of machinery/vehicles should occur both inside and out for where dirt, plant material and seeds may be lodged or adhering to surfaces. Cleaning would occur in areas where contamination and seed spread would not be possible (*i.e.*, ideally mud free, gravel or hard surface; at least 30 m from any watercourse, water body and retained natural vegetation). Particular attention is to be paid when operating in areas known to have invasive plants or in 'high risk' areas such as disturbed areas near known locations.

4.1.5 Recommended Approach

Given the expanse and density of the European Buckthorn population within the 2.6 ha invasive species management area, a combination of mechanical and chemical techniques is recommended. Smaller plants are to be removed manually, and the larger trees treated with a systematic herbicide. Manual removal (pulling) of small seedlings and saplings reduces chemical use, while treating larger plants will prevent re-growth. Foliar application of a systemic herbicide should be avoided and limited to larger populations of smaller trees where pulling is impractical. The preferred chemical application technique would be to cut the tree and treat the freshly cut stump with a systemic herbicide. A coloured dye can be added to the herbicide to identify and mark the treated stumps. Basal bark herbicide application (spraying) is not recommended for this project due to the potential for herbicide overspray.

European Buckthorn management requires a multi-year, adaptive approach. The efficacy of management methods employed should be reviewed and assessed each growing season to determine if additional or alternative treatment is necessary. See Section 5 of this report for maintenance and monitoring details.

4.2 COMPENSATION PLANTINGS

This Ecological Compensation Plan has been designed to increase treed lands and canopy cover on the property, adjacent to the proposed development footprint. Furthermore, European Buckthorn control is much more successful when heavily infested areas are re-planted with native plant species that can compete with new buckthorn growth.



This plan considers woodland removals required for the proposed development, with the ability to protect the remaining swamp and upland forest woodlands on the property and enhance lower quality areas via invasive species management and plantings of native species. This plan provides for European Buckthorn management and planting of native tree and shrub specimens within the natural lands of the property, resulting in an overall establishment and enhancement of 2.7 ha of native woodland habitat, which will exceed the 0.58 ha Significant Woodland area replacement target of 2:1, while providing additional opportunities and greater diversity for wildlife.

4.2.1 Planting

A tree inventory and preservation plan (Birks NHC, 2026) has been undertaken to quantify and characterize the nature of the tree resources present within the development area. The data has been utilized here to direct the recommendations for stem and canopy cover replacement. For this property, there are invasive species (European Buckthorn), exotic species (apple trees, Manitoba Maple) and failing trees (Green Ash, White Ash) that would not warrant replacement. Thus, our compensation and replacement calculations consider these factors in calculating the number of stems to be replaced. The Significant Woodland areas to be removed, stem density per ELC community, and stem compensation ratio is presented in Table 1 below.

Table 1. Compensation Calculations

ELC Community	Woodland Area to be Removed (ha)	Stem Density (stems/ha) ¹	Stem Compensation Ratio 2:1
FODM7-2 Green Ash-Lowland Deciduous Forest	0.09	180	32
FODM3-1 Poplar Deciduous Forest	0.49	445	436
<i>Significant Woodland Total</i>	<i>0.58</i>		<i>468</i>

¹ Density calculations exclude European Buckthorn, Apple sp., White Ash and Green Ash.

A total of 395 trees and 195 shrub specimens are to be planted in the retained natural areas (Planting Areas A through D) and 22 trees between the back lot line of proposed lots and the proposed servicing corridor (Planting Areas E and F), for a total of 612 woody plantings. Not considered here are trees that will also be planted within the development site as part of the Landscape Concept Plan, adding approximately 48 additional trees being planted as compensation. Resulting in the overall planting of 465 trees and 195 shrubs which is greater than a 2:1 stem compensation ratio for the proposed Significant Woodland removal areas.

As illustrated in Figure 3, planting of woody shrub and tree material is recommended within the remaining thicket areas and small cultural meadow pockets on the property (Planting Areas A and B). These areas are largely comprised of vegetation species commonly associated with disturbed areas,



including non-native species and the highly invasive shrub European Buckthorn. Planting is also recommended within the Ash swamp community that has experienced significant die-off due to EAB (Planting Area C), and in-fill planting within Poplar woodland communities where European Buckthorn management activities will also take place (Planting Area D). Planting Areas E and F are located between the back lot line of proposed lots and the proposed servicing corridor. Planting Area E will be planted with larger caliber trees upon grading completion, while in-fill planting is proposed in Planting Area F.

The diverse tree and shrub selection for planting within Planting Areas A through D is an improvement over the European Buckthorn dominated communities that are to be removed and will increase the overall biodiversity of those communities and ecological function within the natural lands. Planting patterns are to take a natural approach of spacing and distribution, with species intermixed and randomly planted (not in rows). Within Planting Areas A and B, shrubs are to be planted at a density of 1 m and tree plantings are to follow the density of 2 m on centre to increase competition against any buckthorn seedlings. Generally, planting locations will be “field fit” on site with existing native woody vegetation, particularly in Planting Areas C, D and F. Larger caliper trees will be planted within Area E at a spacing of approximately 4 m on centre.

All plant material should be sourced from a native plant nursery. A diverse selection of native tree and shrub species was chosen for planting based on their compatibility with the existing soils and adjacent vegetative communities, as well as ability to grow quickly and create shade to prevent European Buckthorn re-establishment (such as Balsam Poplar, Trembling Aspen, and Meadow Willow). Control measures are also to be implemented to prevent other species from competing with the planted materials as they establish, such as the use of weed barriers and mulch.

A native seed mix comprised of hardy native perennials, grasses and a non-invasive nurse crop (OSC Seed mix 6845) is recommended to be seeded bordering the service corridor (Figure 3, Area G). The seed mix provides a low-maintenance cover that stabilizes soil and suppresses weeds while the native wildflowers and grasses establish.

4.2.2 Site Preparation

The planting areas are to be prepared prior to planting to avoid possible invasive species contamination and create a positive growing environment. Primarily, site preparation will focus on European Buckthorn management for Planting Areas A through D, prior to any planting activities.

Management of European Buckthorn will aid in prevention of future expansion of the species, reduce incidence of seed spread and thus the potential for establishment of new stands. Planting for site enhancement and restoration must occur only after invasive species measures have been completed and European Buckthorn has been successfully managed. Repeated management will reduce the presence of European Buckthorn and open the area for planting, while retaining healthy native trees to suppress buckthorn germination. For greatest efficacy, planting within the invasive species management areas should only take place after 75% or more of the European Buckthorn has been removed.



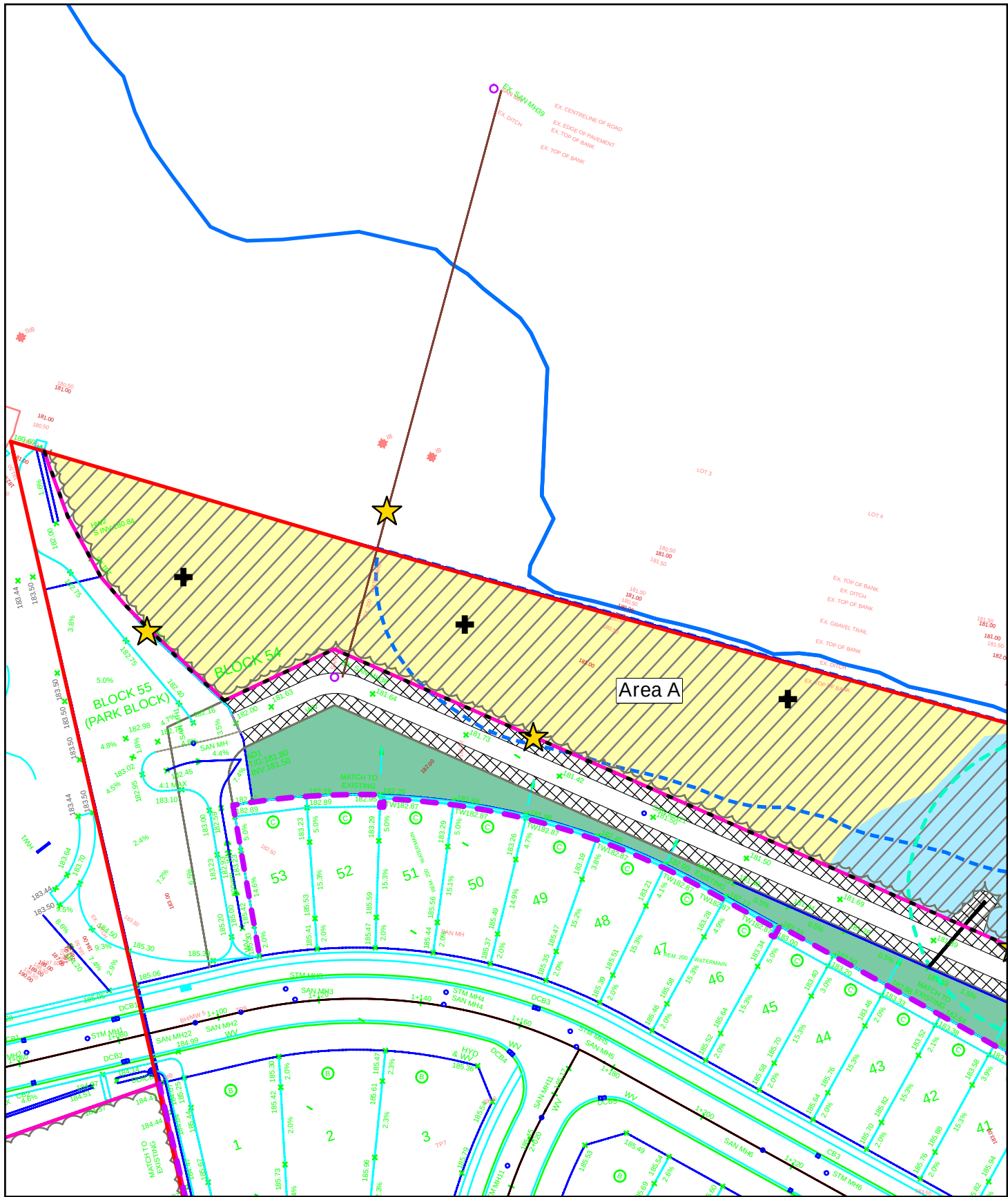
Planting Area E is located in an area that will be disturbed by the development and re-alignment of the servicing corridor; confirm that construction work has been completed prior to planting in Area E. Soil that is lightly compacted to a depth of less than 20 cm, may be punctured with an aerator. If required, imported topsoil must not contain contaminants that can harm plant growth.

4.3 RESTORATION AREA PROTECTION AND SIGNAGE

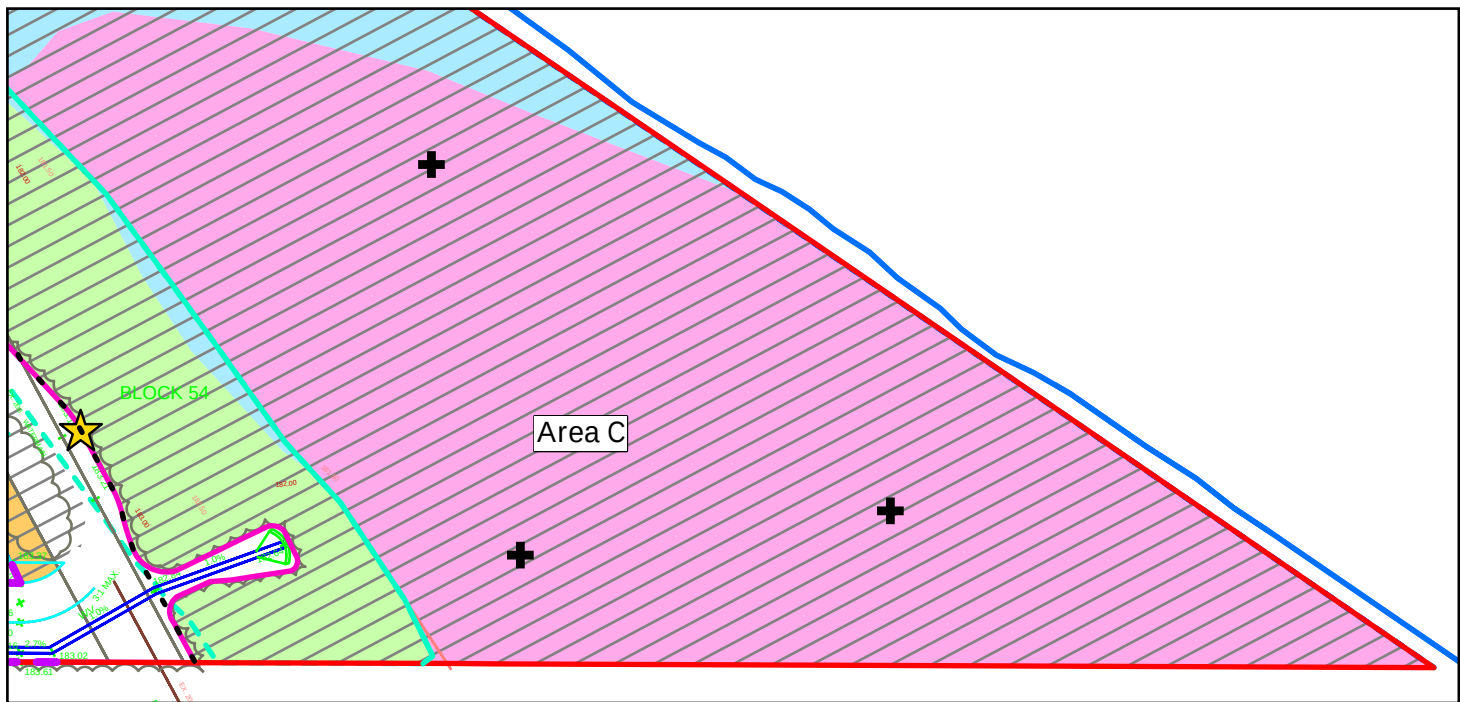
A permeant chain link fence is to be installed along the outer perimeter of the northern lots and along the edge of the end lots (Lot 32 and Lot 53) which will restrict public access and protect the restoration and planting areas.

Signage along the service corridor on the page wire fencing, and at one viewpoint located on the Georgian Trail and the proposed development park area, will indicate that access to the restoration areas is restricted due to the presence of sensitive ecological habitats (Figure 3).

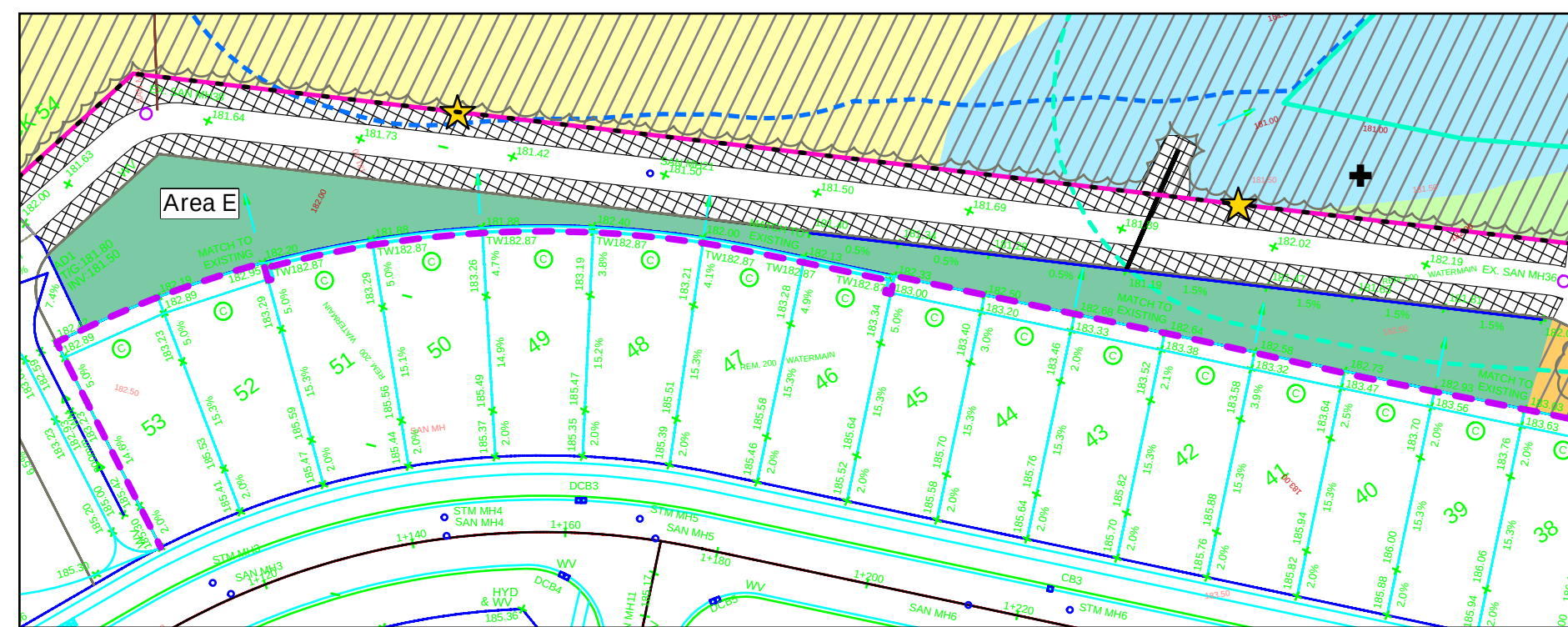
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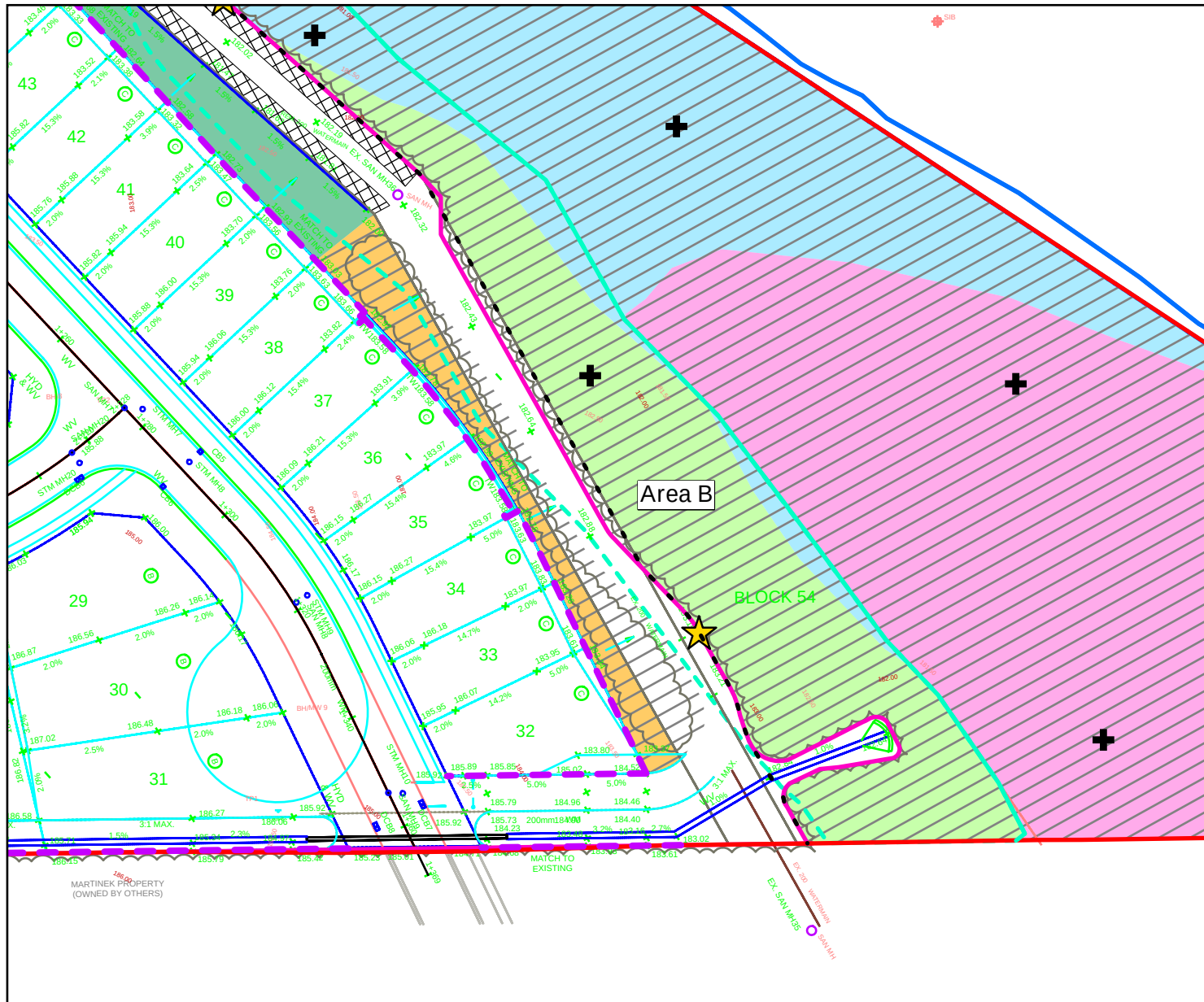
Area C



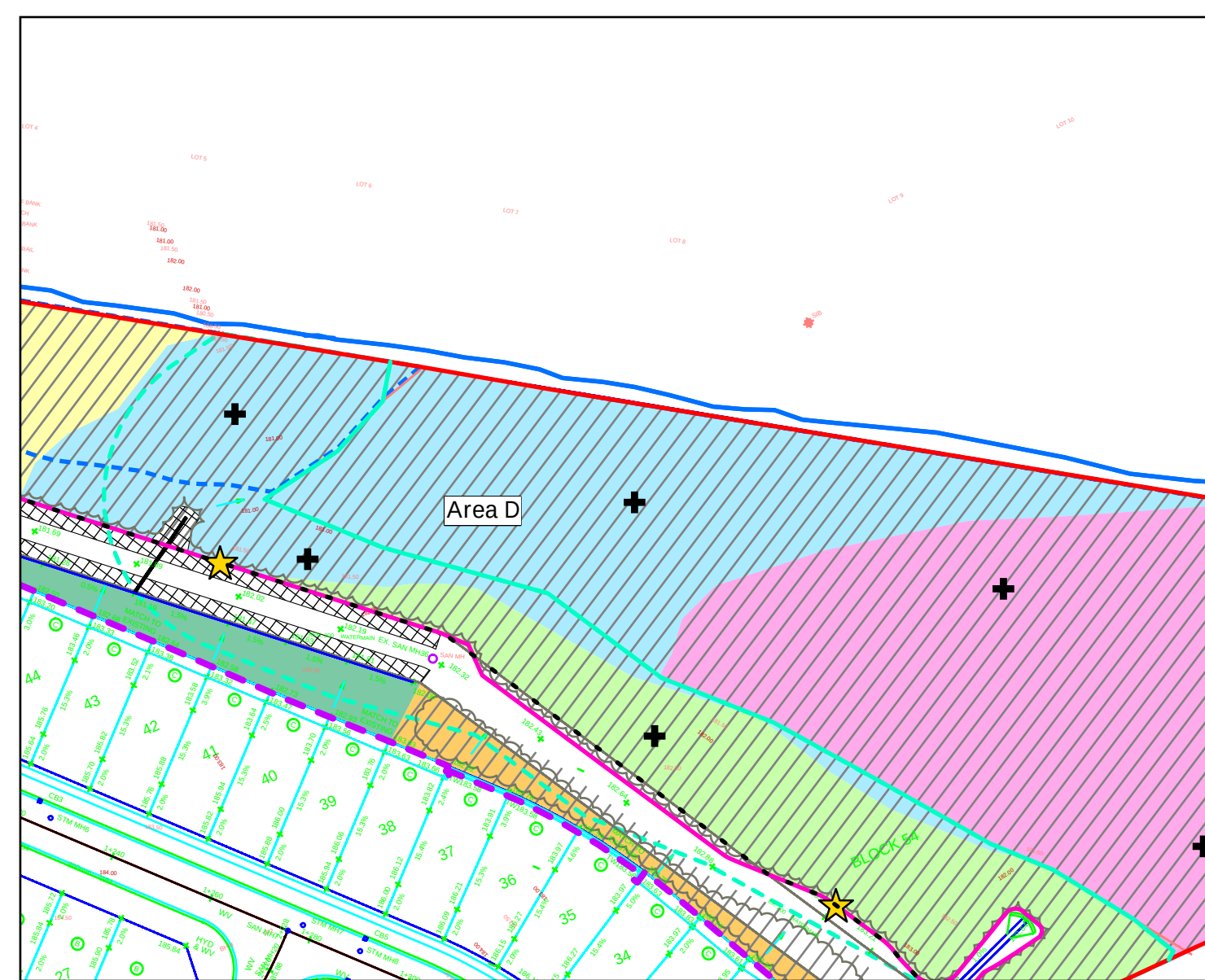
Area E



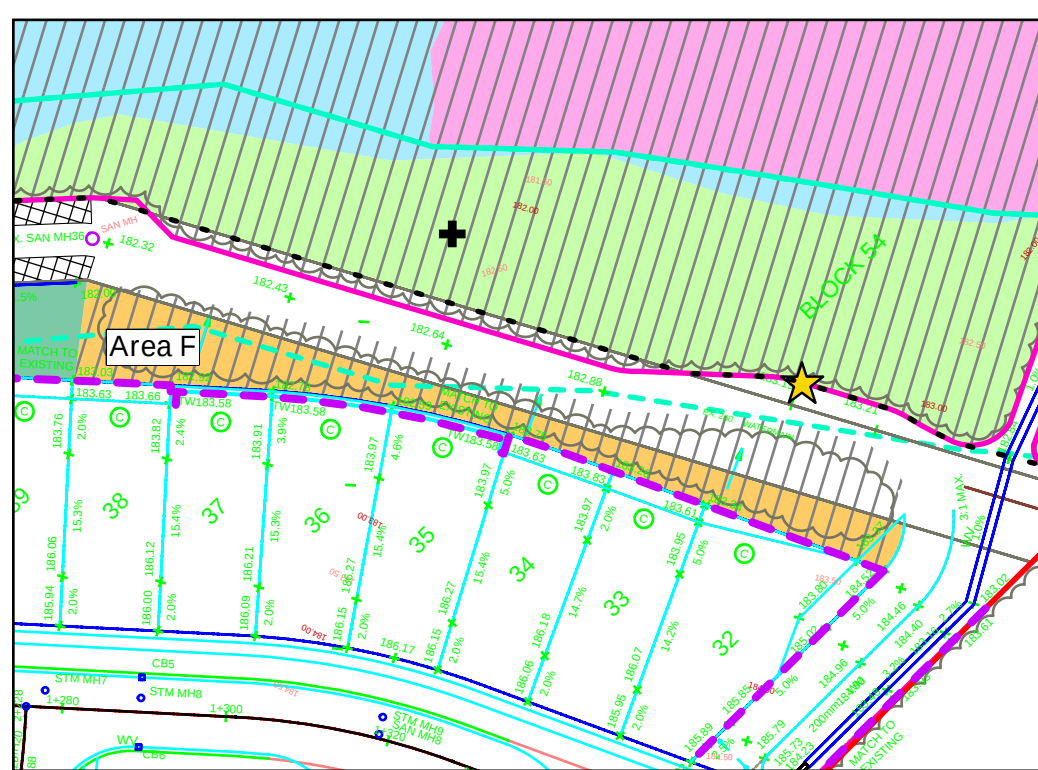
Area B



Area D



Area F



Planting Table

Plant	Common Name (Scientific Name) ¹	Quantity	Density	Type
Planting Area A (0.5 ha)				
Trees	Red Maple (<i>Acer rubrum</i>)	25	Plant trees with spacing of 2.0 m on centre. Intermix species.	Potted trees 1 to 2 gallon container stock.
	Trembling Aspen (<i>Populus tremuloides</i>)	45		
	White Elm (<i>Ulmus americana</i>)	35		
	Balsam Poplar (<i>Populus balsamifera</i>)	40		
Shrubs	Alternate-leaved Dogwood (<i>Cornus alternifolia</i>)	20	Plant shrubs with spacing of 1.0 m on centre. Intermix species.	Potted shrubs. 1 to 2 gallon container stock.
	Red Elderberry (<i>Sambucus racemosa</i>)	15		
	Black Chokeberry (<i>Aronia melanocarpa</i>)	10		
	Meadow Willow (<i>Salix petolaris</i>)	25		
Planting Area B (0.3 ha)				
Trees	White Birch (<i>Betula papyrifera</i>)	25	Plant trees with spacing of 2.0 m on centre. Intermix species.	Potted trees 1 to 2 gallon container stock.
	Trembling Aspen (<i>Populus tremuloides</i>)	30		
	Red Maple (<i>Acer rubrum</i>)	20		
	White Elm (<i>Ulmus americana</i>)	10		
Shrubs	Red Elderberry (<i>Sambucus racemosa</i>)	15	Plant shrubs with spacing of 1.0 m on centre. Intermix species.	Potted shrubs. 1 to 2 gallon container stock.
	Grey Dogwood (<i>Cornus racemosa</i>)	20		
	Red Raspberry (<i>Rubus idaeus</i>)	10		
Planting Area C (1.1 ha)				
Trees	White Elm (<i>Ulmus americana</i>)	25	"Field fit" with existing native vegetation.	Potted trees 1 to 2 gallon container stock.
	Yellow Birch (<i>Betula alleghaniensis</i>)	20		
	Red Maple (<i>Acer rubrum</i>)	40		
	Silver Maple (<i>Acer saccharinum</i>)	35		
Shrubs	Grey Dogwood (<i>Cornus racemosa</i>)	20	"Field fit" with existing native vegetation.	Potted shrubs 1 to 2 gallon container stock.
	Common Elderberry (<i>Sambucus canadensis</i>)	15		
	Dwarf Raspberry (<i>Rubus pubescens</i>)	20		
Planting Area D (0.6 ha)				
Trees	Eastern White Cedar (<i>Thuja occidentalis</i>)	10	"Field fit" with existing native vegetation.	Potted trees 1 to 2 gallon container stock.
	Trembling Aspen (<i>Populus tremuloides</i>)	15		
	Balsam Poplar (<i>Populus balsamifera</i>)	20		
Shrubs	Grey Dogwood (<i>Cornus racemosa</i>)	15	"Field fit" with existing native vegetation.	Potted shrubs 1 to 2 gallon container stock.
	Red Raspberry (<i>Rubus idaeus</i>)	10		
Planting Area E (0.16 ha)				
Trees	Red Maple (<i>Acer rubrum</i>)	2	Plant trees with spacing of 4.0 m on centre. Intermix species.	Potted trees, 7 gallon container stock.
	White Spruce (<i>Picea glauca</i>)	4		
	Tamarack (<i>Larix laricina</i>)	4		
	Trembling Aspen (<i>Populus tremuloides</i>)	2		
Planting Area F (0.10 ha)				
Trees	Red Maple (<i>Acer rubrum</i>)	5	"Field fit" with existing native vegetation.	Potted trees 1 to 2 gallon container stock.
	Trembling Aspen (<i>Populus tremuloides</i>)	5		
Seeding Area (0.13 ha)				
Native Seed Mix OSC	Black Eyed Susan (<i>Rudbeckia hirta</i>), Canada Milk Vetch (<i>Astragalus canadensis</i>), Hoary Vervain (<i>Verbena stricta</i>), Blazing Star (<i>Liatris spicata</i>), Golden Alexanders (<i>Zizia aurea</i>), Foxglove	3.5 kg	25 kg / ha	Seed Mix
Native Seed Mix 6845	Beardtongue (<i>Penstemon digitalis</i>), New England Aster (<i>Symphyotrichum novae-angliae</i>), Little Bluestem (<i>Schizachyrium scorparium</i>), Perennial Ryegrass (<i>Lolium perenne</i>)			

¹ Species selection depends on availability at the time of installation. If substitutions are required, suitable replacements should be approved by a qualified biologist

¹ Species selection depends on availability at the time of installation. If substitutions are required, suitable replacements should be approved by a qualified biologist.

Planting and Monitoring Notes

Site Preparation/Invasive Species Management

- The planting areas are to be prepared prior to planting to avoid possible invasive species contamination and create a positive growing environment.
- Site preparation will focus on European Buckthorn management prior to any planting activities.
- Given the expanse and density of the European Buckthorn population, a combination of mechanical and chemical techniques is recommended:
- Smaller Buckthorn plants are to be removed manually, and the larger trees treated with a systematic herbicide.
- The preferred chemical application technique for European Buckthorn management is to cut the tree and treat the freshly cut stump with a systemic herbicide. Foliar application of a systemic herbicide should be avoided whenever possible.
- European Buckthorn management requires a multi-year, adaptive approach; see Ecological Compensation Plan (Birks NHC, 2026) report for invasive species management details.
- Planting should only take place after 75% or more of the European Buckthorn has been removed.
- Compacted soils may have to be mechanically loosened and aerated prior to planting.

Planting Notes: Potted Shrubs and Trees

- The site is to be planted with native species as per this Compensation Plan.
- Shrub plantings are to follow the density of 1 m on centre and tree plantings to be 2 m on centre.
- Planting locations will be "field fit" on site with existing native vegetation.
- For Planting Area E, larger container stock trees are to be planted with spacing of 4 m on centre.
- Confirm that construction work has been completed prior to planting in Area E.
- Woody materials are to be planted during the growing season if well-watered; otherwise, they are best planted in the spring or fall when the soil is not frozen and there is no frost.
- Planting pattern of trees and shrubs is to follow a natural approach of spacing (no row planting); species are to be intermixed.
- The planting hole should be dug at least twice as wide as the widest part of the container and slightly deeper than the depth of the container. The sides of the hole should be roughened to allow root penetration and ensure water flow.
- Remove the container before installing the plant material. Roots matted on the bottom should be loosened by hand.
- Once the plant is placed, the hole is two-thirds backfilled with gently tamped soil. At this point the remaining space should be filled with water to settle the soil around the roots. Once the water is drained from the hole the remaining space should be backfilled to the soil line (i.e., the region of the plant where root and shoot meet - the "collar").
- A ring around the tree/shrub should be mulched, ensuring that the mulch is pulled away from the root flare to allow for oxygen exchange at the base of the plant.
- Protective guards should be installed for the shrubs and trees to protect from wildlife browse and damage.

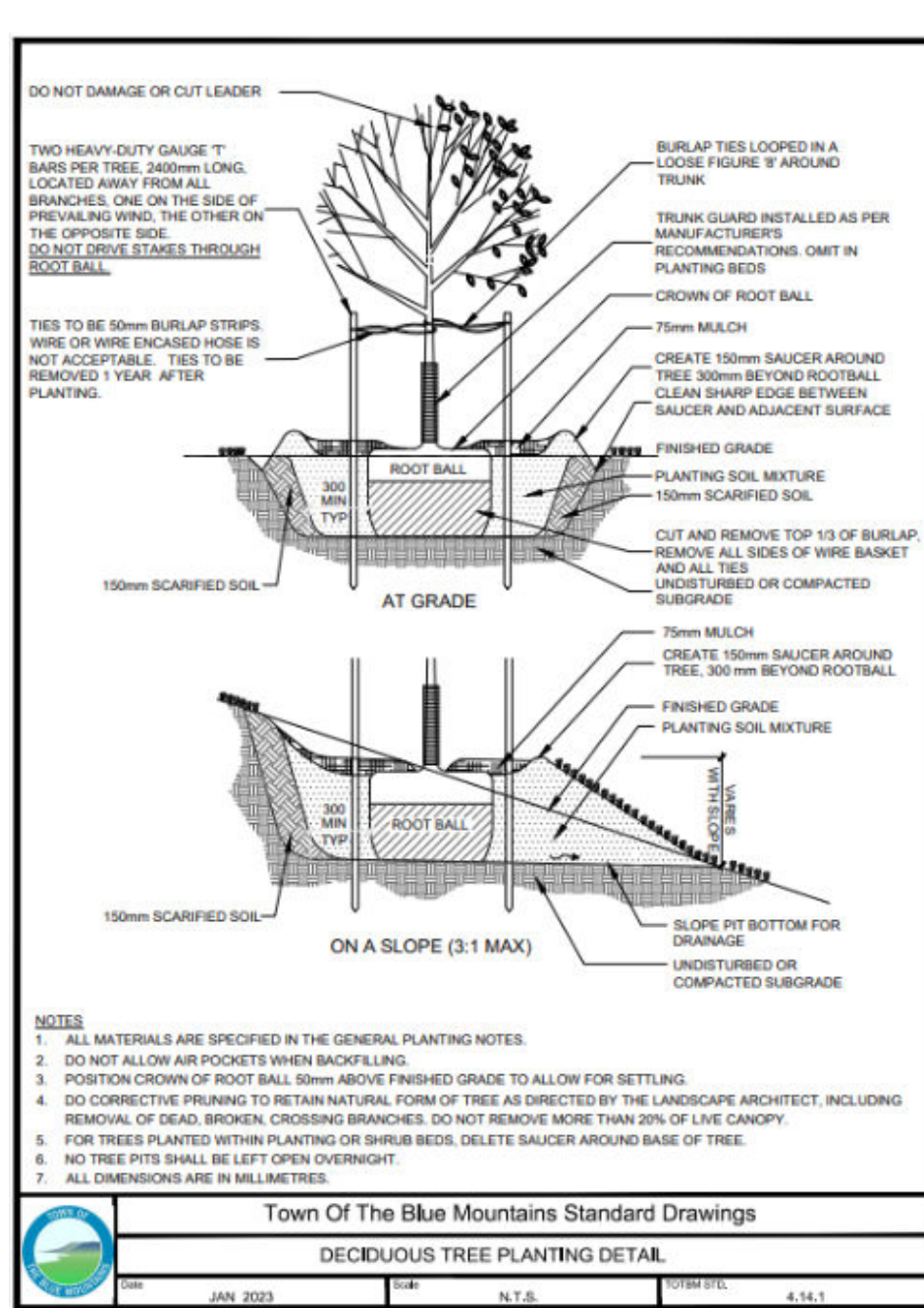
Planting Notes: Seeding

- Native seed mixes do best when planted in the fall, typically between mid-October and mid-November. An early spring sowing in April is possible however unseasonable weather can prevent decent seed stratification causing the seed to not germinate until the spring of the following year.
- Prior to seeding, loosen the soil to 1 inch depth with a stiff rake, cultivator or hoe.
- Topsoil is to be added to the seeding areas prior to seeding to create a more nutrient and mineral rich environment.
- Mix the seed with substrate to improve distribution and broadcast the seed mix evenly throughout the seeding area.

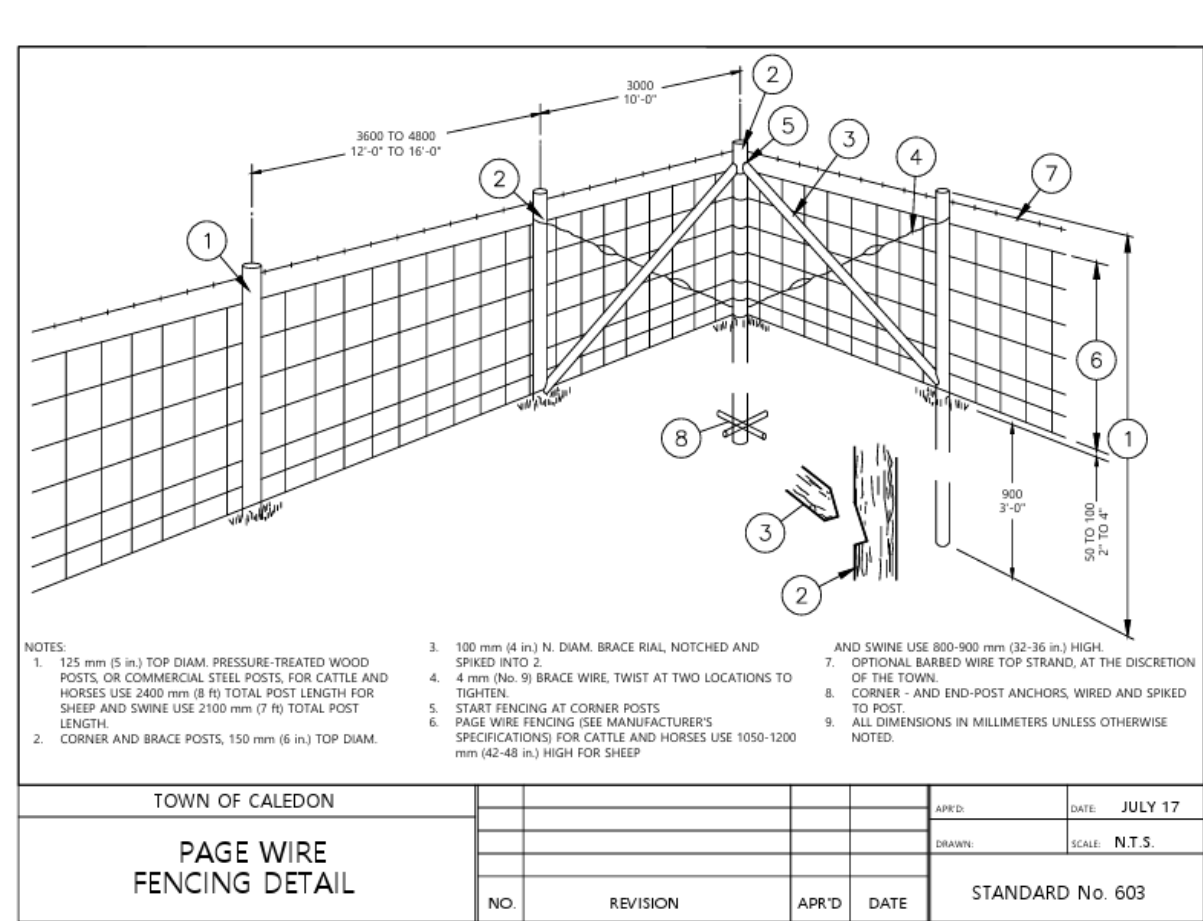
Maintenance and Monitoring

- Planted specimens should be maintained for two years following installation, as follows:
- Watering of planted stock should occur during drought or low rainfall periods.
- Vegetation/weed control should be applied around the base of each tree and shrub which may include, for example, coco fiber tree rings, trimming, weed pulling, weed control fabric, and/or mulch.
- Due to the dense planting plan and expected successional die-off, a success rate of 60% should be targeted for tree and shrub plantings in Planting Area A and Planting Area B; and a success rate of 75% for Planting Areas C, D and E, following a two-year maintenance period.
- Protective guards should be removed after 2 to 3 years of growth.

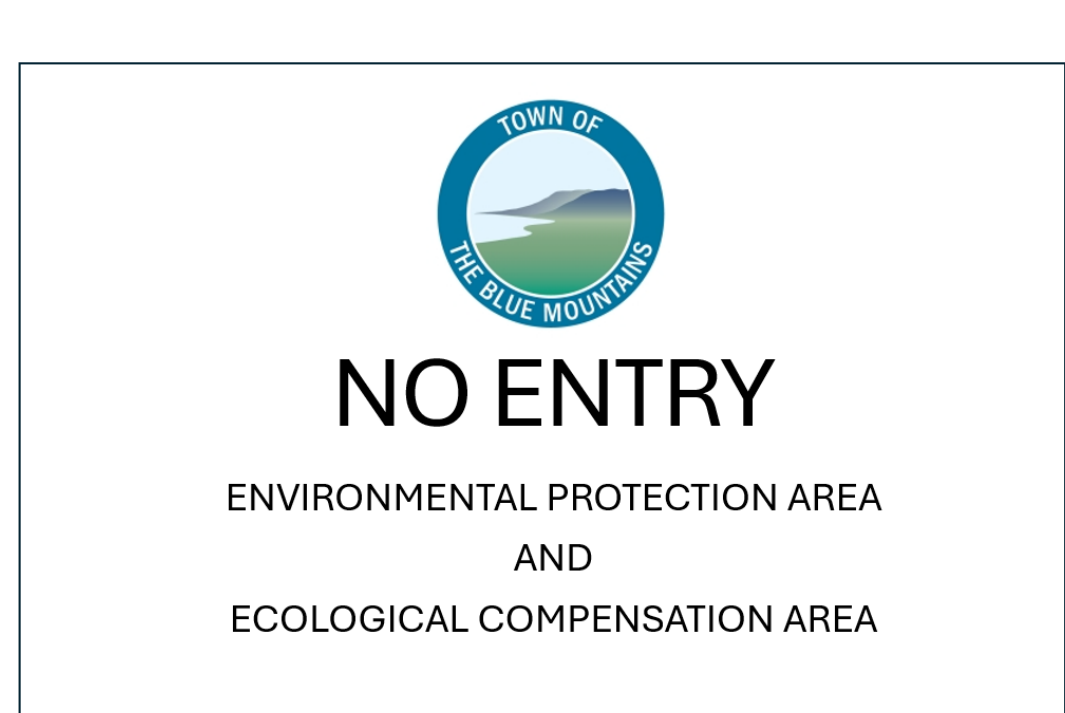
Tree Planting Details N.T.S.



Page Wire Fencing Detail N.T.S.



Signage Detail N.T.S.



372 Grey Road 21 - West

Town of the Blue Mountains

Property Limit
Wetland Limit (Birks NHC/Tatham)
30m Wetland Setback
Watercourse (Ontario GeoHub)
30m Watercourse Setback

Proposed Limit of Grading (Tatham)
Proposed Page Wire Fencing (approx.)
Proposed Chainlink Fence (approx.)
Signage Location

Compensation Planting Areas (2.7 ha)
Planting Area A (0.5ha)
Planting Area B (0.3ha)
Planting Area C (1.1ha)

Planting Area D (0.63ha)
Planting Area E (0.15ha)
Planting Area F (0.06ha)

Invasive Species Management (2.6 ha)
Monitoring Plot Locations
Seeding

Figure 4. Ecological Compensation Plan Details

MAP DRAWING INFORMATION:
DATA PROVIDED BY: ESRI CANADA
MAP CREATED BY: SB
MAP CHECKED BY: MF
MAP PROJECTION: NAD 1983 UTM ZONE 17N

FILE LOCATION:
Path: C:\Users\S_Brady\BirksNHC\Birks NHC Team for all - Documents\Project Folders\04 - SBrady Projects\ArcGIS - Projects\here\Projects - here\372GreyRoad21West
PROJECT: 04-010-2021
STATUS: FINAL
DATE: 17/07/2026



5 MAINTENANCE AND MONITORING PLAN

5.1 EUROPEAN BUCKTHORN

Follow-up monitoring and removal of new growth are essential for successful control, especially given that European Buckthorn seeds can remain viable in the soil for up to 5 years. Therefore, management and monitoring activities will occur yearly prior to, and after, planting of native trees and shrubs.

Monitoring plot locations are to be established to determine baseline conditions, monitor European Buckthorn presence and effectiveness of management activities. Each plot is to be 10 m x 10 m in size, with a permanent marker (*i.e.*, stake) at the centre of the plot to visually mark the location for future monitoring. Additionally, a hand-held GPS is to be utilized to record the co-ordinates of the marker at each of the monitoring plots to enable ease of re-location during future monitoring visits. Ten (10) monitoring plots are to be established among the natural areas retained and managed for European Buckthorn (Figure 3).

European Buckthorn 'Year 1' would be the baseline condition prior to management/removal activities; removal activities are expected to begin within the same year. Data at each of the monitoring plots is to be collected, beginning in Year 1, pertaining to number of European Buckthorn stems, size and condition (0 – dead; 1 – in poor condition; 2 – showing signs of damage; 3 – in good health). Monitoring plots will be re-visited and monitored annually to review the efficacy of management methods employed and assess if additional or alternative treatment is necessary.

Removal of at least 75% of the existing European Buckthorn is targeted prior to planting the area. Once the plantings have been installed, European Buckthorn monitoring can occur at the same time as the annual monitoring of the native plantings. Any newly identified European Buckthorn seedlings are to be promptly removed manually (hand pulled) upon detection.

5.2 NATIVE PLANTINGS

Planted specimens should be maintained following installation, with follow up inspections to record plant survival. Maintenance activities during Planting Year 1 (planted year) and the following year shall involve the watering of planted stock during drought or low rainfall periods, vegetation/weed control around the base of trees and shrubs (which may include, for example, coco fiber tree rings, trimming, weed pulling, weed control fabric, and/or mulch), and protective guards to protect young trees and shrubs from wildlife browse and damage. Protective guards should be removed after 2 to 3 years of growth.

An inspection of the plantings should occur by a qualified professional once installation is complete and to collect baseline data. Monitoring plot locations previously established to monitor European Buckthorn will also be used to monitor the survival and growth of planted vegetation. Monitoring will occur at each of the monitoring plots once yearly mid-growing season (summer) and within each plot the following parameters will be collected: number of trees/shrubs planted and their species; condition of each planted tree/shrub (0 – dead; 1 – in poor condition; 2 – showing signs of damage; 3 – in good health). Photos are to be taken within the plot from a fixed location (the centre plot marker).



Additional notes on other herbaceous plant species, environmental conditions, establishment of invasive species (particularly European Buckthorn) are to be recorded. Data is to be collected starting in the year they are planted (Planting Year 1 - baseline data) and monitored annually thereafter in Planting Year 2 and Planting Year 3.

Due to the dense planting plan and expected successional die-off, a success rate of 60% should be targeted for tree and shrub plantings in Planting Area A and Planting Area B; and a success rate of 75% for Planting Area C, Planting Area D, Planting Area E, and Planting Area F following a two-year maintenance period.

6 TIMING

The following summarizes the recommended phasing for implementation of this Ecological Compensation Plan. The first phase places priority on removal and management of invasive plants as part of preparing the sites for enhancement and re-naturalization. Planting with a diverse selection of native species in the next phase will assist in preventing re-growth of invasive species, facilitate the establishment of native species and provide a diverse habitat for wildlife species that are present in the area.

Phase 1 – European Buckthorn Baseline Conditions

- Establish the monitoring plots among the natural areas retained and managed for European Buckthorn (distribution of plots illustrated on Figure 3).
- Collect baseline data as outlined above.

Phase 2 – Invasive Species Management

- Smaller plants are to be removed manually (fall season).
- Larger trees are to be cut and treated with a systematic herbicide (fall season).
- Monitor annually and assess if additional or alternative treatment is necessary (summer).

Phase 3 – Planting

- Planting should only take place after 75% or more of the European Buckthorn has been removed.
- Confirm that construction work has been completed prior to planting in Area E and prior to seeding Area G.
- Woody materials are to be planted during the growing season if well watered; otherwise, they are best planted in the spring or fall when the soil is not frozen and there is no frost.

Phase 4 – Plant Maintenance and Monitoring

- Planted specimens should be maintained the year they are planted and the following year.



- An inspection of the plantings should occur by a qualified professional once installation is complete.
- Monitoring data is to be collected starting in Planting Year 1 - baseline data and annually thereafter in Planting Year 2 and Planting Year 3.
- Protective guards should be removed after 2 to 3 years of growth.
- Due to the dense planting plan and expected successional die-off, a success rate of 60% should be targeted for tree and shrub plantings in Planting Area A and Planting Area B; and a success rate of 75% for Planting Areas C, D and E, following a two-year maintenance period.

6.1 BREEDING BIRD PROTECTION

Migratory birds, nests, and eggs are protected by the *Migratory Birds Convention Act, 1994* and the *Fish and Wildlife Conservation Act, 1997*. Tree removals and herbicide application therefore are to be avoided between April 1 and August 31 to reduce the potential of incidental impact to breeding birds.

6.2 SPECIES AT RISK PROTECTION

Given the dynamic character of the natural environment, as well as changes to policy (*i.e.*, new species listing, changes in species health or habitat conditions), annual consideration of current legislation and Species at Risk habitats is recommended in the interpretation of potential presence of Threatened or Endangered species as protected by provincial and federal legislation.

As of March 30, 2026, Ontario's *Species Conservation Act, 2025* ('SCA') came into force and the provincial *Endangered Species Act, 2007* was repealed. The SCA provides regulatory protection to Endangered and Threatened species as listed under Ontario Regulation ('O. Reg.') 60/26 Protected Species in Ontario List. Activities impacting those species not on the Protected Species in Ontario List must comply with federal legislation such as the federal *Species at Risk Act*, the *Fisheries Act*, and the *Migratory Birds Convention Act*.

6.2.1 Endangered Bat Species

Tree removals should occur outside of the active roosting season for Endangered bat species that may utilize habitats in the area. Tree cutting should therefore be timed to occur during the period between November 1 to March 31 and no removals outside of the designated development area should occur. This will ensure that no bats actively roosting in trees will be killed or harmed as a result of clearing activities and incorporates the breeding bird timing window mentioned above.

7 CONCLUSIONS

Birks NHC was retained to undertake the preparation of an Ecological Compensation Plan for the lands located at 372 Grey Road 21 - West, in association with a proposed residential development. This Ecological Compensation Plan addresses woodland removals that would occur in the development area



and details restoration and compensation measures to offset those removals. This report has been prepared to satisfy the requirements of the Town of the Blue Mountains and Grey County and has been prepared in consultation with those organizations.

The Ecological Compensation Plan involves European Buckthorn management and native plantings that will serve to enhance the protected natural lands within the property, while allowing for the proposed development to proceed, and result in an overall increase in biodiversity and ecological function compared to pre-restoration activities.



8 REFERENCES

- Birks Natural Heritage Consultants, Inc. (Birks NHC). 2023. 372 Grey Road 21 West Parcel, Town of The Blue Mountains, Environmental Impact Study.
- Birks Natural Heritage Consultants, Inc. (Birks NHC). 2025a. 372 Grey Road 21 West Parcel, Town of The Blue Mountains, Environmental Impact Study Update.
- Birks Natural Heritage Consultants, Inc. (Birks NHC). 2025b. Tree Inventory and Protection Plan. July 2025.
- Birks Natural Heritage Consultants, Inc. (Birks NHC). 2026a. 372 Grey Road 21 West Parcel, Town of The Blue Mountains, Environmental Impact Study Update.
- Birks Natural Heritage Consultants, Inc. (Birks NHC). 2026b. Tree Inventory and Protection Plan update.
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- Ontario Invasive Plant Council (OIPC). 2012. Invasive Common (European) Buckthorn (*Rhamnus cathartica*): Best Management Practices in Ontario.
- Ontario Invasive Plant Council (OIPC). 2026. <https://www.ontarioinvasiveplants.ca/>
- Ontario Invasive Plant Council (OIPC). 2024. Common Buckthorn (*Rhamnus cathartica*) Best Management Practices Technical Document for Land Managers. June 2024. https://www.ontarioinvasiveplants.ca/wp-content/uploads/2024/09/Buckthorn_Technical_Bulletin_Web_FINAL_2024_09_13.pdf
- Ministry of Agriculture, Food and Rural Affairs (MAFRA). 2022. Noxious Weeds in Ontario. <https://www.ontario.ca/page/noxious-weeds-ontario>
- Town of The Blue Mountains. 2025. Town of the Blue Mountains Official Plan. <https://www.thebluemountains.ca/planning-building-construction/current-projects/strategic-projects-initiatives/official-plan-review>



372 Grey Road 21 (West), Town of The Blue Mountains
Ecological Compensation Plan

BIRKS NHC 04-010-2021
July 2026

Town of The Blue Mountains. Town of The Blue Mountains Tree Preservation By-law No. 2010-68
<https://www.thebluemountains.ca/sites/default/files/2021-09/2010-68%20Tree%20Preservation%20By-Law.pdf>

Appendix A

Costing Table



Plant Material Estimate

Plant	Common Name (<i>Scientific Name</i>) ¹	Quantity	Price Per Unit*	Total Cost
Planting Area A (0.5 ha)				
Trees	Red Maple (<i>Acer rubrum</i>)	25	\$ 30.00	\$ 750.00
	Trembling Aspen (<i>Populus tremuloides</i>)	45	\$ 35.00	\$ 1,575.00
	White Elm (<i>Ulmus americana</i>)	35	\$ 25.00	\$ 875.00
	Balsam Poplar (<i>Populus balsamifera</i>)	40	\$ 30.00	\$ 1,200.00
Shrubs	Alternate-leaved Dogwood (<i>Cornus alternifolia</i>)	20	\$ 20.00	\$ 400.00
	Red Elderberry (<i>Sambucus racemosa</i>)	15	\$ 20.00	\$ 300.00
	Black Chokeberry (<i>Aronia melanocarpa</i>)	10	\$ 25.00	\$ 250.00
	Meadow Willow (<i>Salix petiolaris</i>)	25	\$ 20.00	\$ 500.00
Planting Area B (0.3 ha)				
Trees	White Birch (<i>Betula papyrifera</i>)	25	\$ 30.00	\$ 750.00
	Trembling Aspen (<i>Populus tremuloides</i>)	30	\$ 35.00	\$ 1,050.00
	Red Maple (<i>Acer rubrum</i>)	20	\$ 30.00	\$ 600.00
	White Elm (<i>Ulmus americana</i>)	10	\$ 25.00	\$ 250.00
Shrubs	Red Elderberry (<i>Sambucus racemosa</i>)	15	\$ 20.00	\$ 300.00
	Grey Dogwood (<i>Cornus racemosa</i>)	20	\$ 20.00	\$ 400.00
	Red Raspberry (<i>Rubus idaeus</i>)	10	\$ 20.00	\$ 200.00
Planting Area C (1.1 ha)				
Trees	White Elm (<i>Ulmus americana</i>)	25	\$ 25.00	\$ 625.00
	Yellow Birch (<i>Betula alleghaniensis</i>)	20	\$ 25.00	\$ 500.00
	Red Maple (<i>Acer rubrum</i>)	40	\$ 30.00	\$ 1,200.00
	Silver Maple (<i>Acer saccharinum</i>)	35	\$ 30.00	\$ 1,050.00
Shrubs	Grey Dogwood (<i>Cornus racemosa</i>)	20	\$ 20.00	\$ 400.00
	Common Elderberry (<i>Sambucus canadensis</i>)	15	\$ 20.00	\$ 300.00
	Dwarf Raspberry (<i>Rubus pubescens</i>)	20	\$ 20.00	\$ 400.00
Planting Area D (0.6 ha)				
Trees	Eastern White Cedar (<i>Thuja occidentalis</i>)	10	\$ 35.00	\$ 350.00
	Trembling Aspen (<i>Populus tremuloides</i>)	15	\$ 35.00	\$ 525.00
	Balsam Poplar (<i>Populus balsamifera</i>)	20	\$ 30.00	\$ 600.00
Shrubs	Grey Dogwood (<i>Cornus racemosa</i>)	15	\$ 20.00	\$ 300.00
	Red Raspberry (<i>Rubus idaeus</i>)	10	\$ 20.00	\$ 200.00
Planting Area E (0.16 ha); larger planting stock				
Trees	Red Maple (<i>Acer rubrum</i>)	2	\$ 100.00	\$ 200.00
	White Spruce (<i>Picea glauca</i>)	4	\$ 100.00	\$ 400.00
	Tamarack (<i>Larix laricina</i>)	4	\$ 100.00	\$ 400.00
	Trembling Aspen (<i>Populus tremuloides</i>)	2	\$ 150.00	\$ 300.00
Planting Area F (0.10 ha)				
Trees	Red Maple (<i>Acer rubrum</i>)	5	\$ 30.00	\$ 150.00
	Trembling Aspen (<i>Populus tremuloides</i>)	5	\$ 35.00	\$ 175.00
Planting Area G (0.13 ha)				
Native Seed Mix OSC Native Seed Mix 6845	Black Eyed Susan (<i>Rudbeckia hirta</i>), Canada Milk Vetch (<i>Astragalus canadensis</i>), Hoary Vervain (<i>Verbena stricta</i>), Blazing Star (<i>Liatris spicata</i>), Golden Alexanders (<i>Zizia aurea</i>), Foxglove Beardtongue (<i>Penstemon digitalis</i>), New England Aster (<i>Symphyotrichum novae-angliae</i>), Little Bluestem (<i>Schizachyrium scorparium</i>), Perennial Ryegrass (<i>Lolium perenne</i>)	3.5 kg	\$240.00 / 1 kg \$143.00 / 500 g	\$ 863.00
Plant Materials Estimate				\$ 18,338.00

*Assumed based on current market rates as of May 2026. Price is material only and does not include installation

Monitoring Estimate

Task	Estimated Cost
Year 1 establish monitoring plots/ baseline European Buckthorn data	\$ 5,400.00
Annual monitoring of European Buckthorn prior to planting ~ 2 years	\$ 5,350.00
Annual monitoring of plantings - 3 years	\$ 8,050.00
Monitoring data summary reports - 5 years	\$ 15,000.00
Monitoring Estimate \$ 33,800.00	

Invasive Species Management Estimate

Task	Estimated Cost
European Buckthorn manual removals ~ 2 years	\$ 21,000.00
European Buckthorn stump treatment with herbicide ~ 2 years	\$ 4,000.00
Invasive Species Management Estimate \$ 25,000.00	

Compensation Plan Estimate

Planting Materials Estimate	\$ 18,338.00
Monitoring Estimate	\$ 33,800.00
Invasive Species Management Estimate	\$ 25,000.00
TOTAL ESTIMATE	\$ 77,138.00