



23 Herrell Ave
Barrie, Ontario
L4N 6T5

July 19, 2023

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

Attn: John Rodgers, Owner

Re: Response to Rate Payer Comments for 372 Grey Road 21, a - East Parcel, Town of the Blue Mountains

Following submission of the pre-consultation application, a public meeting and the Environmental Impact Study (EIS) completed by Birks Natural Heritage Consultants, Inc. (Birks NHC; March 14, 2022), comments were received by the Town of the Blue Mountains (Town) from various rate payers and stakeholders within the municipality including:

- Duncan Bristow, Blue Mountain Watershed Trust,
- Madi Hayles,
- Lucy J. Richmond,
- Martin Kilby, and
- Pamela Spence

The EIS was required by the Town of the Blue Mountains (Town) as part of a zoning by-law amendment and consent application. Site specific data was collected by Birks NHC staff during the 2021 field season and involved comprehensive surveys to characterize important natural heritage features associated with the property, including Silver Creek Provincially Significant Wetland (PSW), Significant Woodland, candidate Significant Wildlife Habitat, fish habitat, and potential habitat for Threatened and Endangered Species.



The following provides additional clarification and consideration in order to address the comments and concerns presented by the concerned parties noted above.

The main concern of all of the above noted parties was that the severances were proposed within the Silver Creek Provincially Significant Wetland. In the completion of the EIS comprehensive field surveys were undertaken, including the identification and delineation of any wetland habitat within the property. The resulting wetland limit is presented on Figure 2 within the EIS report and has been approved by the Ministry of Natural Resources and Forestry, the provincially delegated authority for the management of Provincially Significant Wetlands. The updated wetland limit has been incorporated within their online mapping tool available at: <https://geohub.lio.gov.on.ca/datasets/mnrf::wetlands/explore?location=44.660427%2C-80.418959%2C7.86>

No encroachments into wetland habitat are proposed as part of this application, as shown on the EIS Figure 3.

As per the EIS prepared by Birks NHC (March 14, 2022):

An average setback of 25.25 m to the wetland limit has been included to provide a buffer to wetland functions. Due the minimum lot frontage requirements, an encroachment into the 30 m wetland setback of 1,130m² has been proposed in order to allow for the creation of Lot 4 and to allow for the provision of a 6m municipal trail along Grey Road 21. As such, an enhancement area of 2,425m² is being proposed to offset the encroachments. This offsetting strategy would be completed at a ration higher than 2:1 replacement to loss.

Since completion of the EIS, the site plan has been altered to consider a 3 lot severance and drainage swale along the rear yards. A buffer area of 2,034.74 m² and an enhancement area of 2,708.87 m² is now proposed.

In addition, no encroachments into Significant Woodland or critical habitats supporting wildlife are proposed as part of this application, as outlined in Section 6 of the EIS. Further, anticipated impacts and mitigations to prevent them are described in Section 6 and 7 of the report. The report and conclusions of the study have been reviewed and accepted by the Town's natural heritage review agency (Grey Sauble Conservation Authority for this application).

Since the public meeting and receipt of comments Birks NHC has received and reviewed comments provided by the Town of the Blue Mountain's natural heritage review agency pertaining to the EIS. At the time of review, the Town of the Blue Mountains had entered into



an agreement with the Grey Sauble Conservation Authority (GSCA) which facilitated the agency to provide peer review services for applications within the Municipality that have the potential to impact natural heritage features and functions. Birks NHC received comments from GSCA regarding the EIS (March 14, 2022) on July 29, 2022. The Birks NHC response to the comments has been discussed during a meeting with the GSCA (October 4, 2022), the outcome of which has been formalized within a response letter, which comprises part of the resubmission to the Town. GSCA accepted this response in December 2022.

Closure

We trust the information provided above will be sufficient to address the concerns put forth by the stakeholders and rate payers of the municipality. The information provided herein should be considered in conjunction with the reports and background information submitted to date.

If you have any questions regarding this project, please do not hesitate to contact us.

Yours truly,
Birks Natural Heritage Consultants, Inc.

Melissa Fuller, H.B.Sc
Ecologist