



Severn Sound Environmental Association

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April 16, 2013

Mr. Shawn Persaud, BA, MCIP, RPP
Manager of Planning & Development
Corporation of the Township of Tiny
130 Balm Beach Road West
Tiny ON L0L 2J0

Dear Mr. Persaud,

**RE: Comments concerning the proposed Sibthorpe Pit, Township of Tiny,
County of Simcoe**

In addition to the documents reviewed for Severn Sound Environmental Association's previous comments, the following information relating to the subject property has been reviewed.

1. Response to the Peer Review of the EIS and Natural Environment Level 1 & 2 Technical Report for the Sibthorpe Pit, Township of Tiny, County of Simcoe, dated October 10, 2012, prepared by David Bell.
2. Second Response to the Peer Review of the EIS and Natural Environment Level 1 & 2 Technical Report for the Sibthorpe Pit, Township of Tiny, County of Simcoe, dated November 26, 2012, prepared by David Bell and Les Selby.
3. Supplemental information on site visits, including timing, weather conditions, and purpose, provided at the February 15, 2013 meeting and via summary report, dated February 26, 2013 (received March 7), prepared by David Bell.

Severn Sound Environmental Association (SSEA) offers the following comments.

Fieldwork

With regards to completeness of fieldwork, the work conducted to date is adequate. However, if additional field work or studies are required, a pre-consultation meeting must be held to approve a detailed Terms of Reference, including appropriate survey methodologies and other expectations.

Natural Heritage Policies/Guidelines

The November letter states that the approach and conclusions for Sibthorpe Pit are the same as those for Sarjeant's Waverley Pits 1 & 2. Rules and standards have changed since the Sarjeant's and Teeton pits were approved, including direction from the Ministry of Natural Resources (MNR):

- Second Edition Natural Heritage Reference Manual (MNR 2010)
- 2012 Draft Ecoregion Schedules to support the Significant Wildlife Habitat Technical Guide (MNR)
- Lists of provincial and federal Species At Risk.

It is important to recognize that Natural Heritage information, policies and guidelines are periodically amended and updated, and development proposals must be assessed based on the best information available at the time of the application.

Woodland and Interior Forest Habitat

SSEA conducted an analysis of forest cover for the MacDonald Creek watershed, and modeled the impacts of several extraction scenarios for the Sibthorpe pit (see attached).

The Second Response letter indicated that the applicant is prepared to plant trees on an additional 10 ha of the Cedarhurst Teeton site adjacent to the proposed licensed property. SSEA agrees with this concept in principle, but would like to be provided with a map or digital shapefile that shows the location of this additional planting.

The consultant confirmed in the November letter that tree cutting will only occur between September and February. This will help protect any forest nesting birds on site.

The consultant acknowledges that there will be loss of forest cover and interior forest habitat as a result of this proposal. Based on information from the consultants and the forest cover analysis conducted by SSEA, at a minimum, Phase 3 should be excluded from the proposed extraction area. This phase is within the significant woodland patch on the property, and includes interior forest more than 100 m from an edge. In addition, the EIS identified this area as containing old growth/mature stands, with most trees 110 years old. Excluding Phase 3 will reduce the loss and fragmentation of woodland habitat, features and functions, and help minimize impacts to Significant Woodland and interior forest habitat while allowing the pit to proceed. The consultants have not suggested any alternative mitigation approaches that would satisfy the objectives of the Township of Tiny Official Plan to "minimize the loss or fragmentation of significant woodland features and the habitats and ecological functions they provide" (Section B2, Environmental Protection Two) or to "ensure that new extractive activities are carried

out with minimal environmental and social costs” (Section B14, Mineral Aggregate Resources Two).

If Phase 3 is excluded from the extraction area, an operational setback from the top of the slope would be required to maintain stability; this should be a minimum of 10 m in width, and should be a no-touch zone (i.e., no berms or stockpiles permitted). SSEA recognizes that excluding Phase 3 will reduce the amount of material available for extraction, however Section B14.6 of the Township’s Official Plan indicates that the preservation of Significant Woodlands is deemed to be more important than the extraction of aggregate.

To further mitigate long-term impacts to forest cover, rehabilitation of extracted areas must include native tree species and maximize interior forest habitat.

North Buffer

At the February 15, 2013 meeting, the proponent indicated that berms will not be required in all locations on the north side of the property. Where berms are required, they should be seeded with an appropriate mix, and natural succession should be allowed to occur (i.e., no regular cutting of tree/shrub growth on the berms). SSEA will provide suggestions for a seed mix at a later date.

Please contact us with any questions.

Yours truly,



Keith Sherman,
Executive Director



Michelle Hudolin,
Wetlands and Habitat Biologist

CC: Sandra Mattson