



**Severn Sound Environmental Association**

67 Fourth Street Midland, Ontario L4R 3S9

(705) 527-5166 - FAX (705) 527-5167

Email: [ksherman@midland.ca](mailto:ksherman@midland.ca)

Website: [www.severnsound.ca](http://www.severnsound.ca)

June 25, 2012

Mr. Shawn Persaud, BA, MCIP, RPP  
Manager of Planning & Development  
Corporation of the Township of Tiny  
RR 1  
Perkinsfield ON L0L 2J0

Dear Shawn,

**RE: REVIEW OF PROPOSED CEDARHURST QUARRIES & CRUSHING  
LTD (SIBTHORPE PIT), BEAMISH LTD., TOWNSHIP OF TINY,  
COUNTY OF SIMCOE**

---

The following documents relating to the subject property have been reviewed.

1. License Site Plan from C.T. Strongman Surveying Ltd. dated January 31, 2012, 4 Sheets
2. Environmental Impact Statement and Natural Environment Level 1 and 2 Technical Report by The Lindsay Environmental Services Group, dated September 30, 2011
3. OP Excerpts: Schedule A – Land Use and Schedule B – Natural Features of the Township of Tiny Official Plan as they relate to the subject lands; Section B2 Environmental Protection Two of the Township of Tiny OP; Section B14 Mineral Aggregate Resources Two of the Township of Tiny OP; Part C Environmental and Groundwater Management Policies of the Township of Tiny OP
4. Planning Report PD-020-12 dated March 16 12
5. Summary Statement Report, dated Nov 28 2011 by Dennis C. Simmons Development and Land Management Consulting Services;
6. Hydrogeological Assessment, dated Apr 12 2011 by Alpha Environmental Services Inc. (to be peer reviewed by R.J. Burnside & Associates;
7. Planning Report, dated Feb 2012, prepared by Les C. Selby Consulting Services (to be peer reviewed by Township Planning Staff)

## Comments on the EIS Natural Environment Level 1 & 2 Technical Report

In general, the forest cover analysis in the report started with the 2002 SOLRIS forest cover layer. The comparison with “How much habitat is enough” document should use the entire forest layer and not remove plantations that are part of the contiguous forest patch, as was done in their analysis. Our comparative analysis (copy attached) shows that there are larger interior forest patches in the existing condition of the area than were shown by the EIS document. Their analysis (Figure 16) shows interior forest patches that are not merged, artificially reducing the interior forest patch size. The 15m setback to the property boundary was not used in the forest cover analysis.

The report states that “only forest on the proposed licensed property that meets the [Significant Woodland] criteria is ELC01...” [p.27, section 4.13 Significant Woodlands] and “Most of the remaining forest, approximately 26 ha, on the proposed licensed property is small plantations of various species and ages and stands of young secondary growth. These stands do not have the attributes to be considered significant.” [p.31, section 5.5 Significant Woodlands] however, the significant woodland criteria are not meant to be applied to individual stands within a forest, but rather to the contiguous forest patch.

The report implies that there will be minimal impact on Significant Woodlands and interior forest: “...with the additional loss of forest cover as a result of the proposed Cedarhurst Sibthorpe Pit, the Wye River watershed would continue to have more than the minimum forest habitats...” [p.33-35, section 5.7.2 Vegetation Functions]. However, How Much Habitat is Enough guidelines are not minimums, i.e., we should not be allowing loss of habitat or managing down to ‘only’ 30% forest cover in a watershed; consideration should be given to maintaining as much existing habitat as possible. The loss of forest cover and interior forest on the property would impact the Significant Woodland patch, as well as the watershed.

Although linkages/corridors were not identified in either the County or Township Official Plans, the forest habitat itself is a linkage, so “no linkage values will be impacted by this proposal” is inaccurate.[ p.9, section 4.6.4 Linkages]. An important objective of Section B2 (ENVIRONMENTAL PROTECTION TWO) of the Official Plan for the Township is “To minimize the loss or fragmentation of significant woodland features and the habitats and ecological functions they provide”. Also an objective in Section B14 (MINERAL AGGREGATE RESOURCES TWO) is “to ensure that new extractive activities are carried out with minimal environmental and social costs.”

If the Phase 3 area is excluded and kept as a wooded corridor as it presently is, then the pit plan could be seen as having minimal impact on significant woodland and interior forest habitat on the property and in context with surrounding land. If acceptable, the silvicultural prescription and the operational plan should be

amended to reflect this change. It is also recommended that the forest cover along the north side of the property be maintained as part of the 15-m buffer (Page 2 of License Site Plan).

A concern with the retention of existing tree cover, and cutting trees no more than 90 m ahead of extraction operations (p.4), is that this timing could be bad for breeding birds. Any required tree cutting should be conducted outside the breeding season for bird species and other woodland wildlife.

The report indicates that whip-poor-will, bobolink, hog-nosed snake, cerulean warbler, golden-winged warbler, hooded warbler were all possible Species at Risk for the site [p.21-26, sections 4.8 – 4.10]. Site visit timing (March 22, June 11, and October 6, 2010, and May 20, 2011) would not have been appropriate to determine if these species were present on site.

### **Groundwater quality**

It was noted that the water table analysis relied on three wells for the operational plan of the pit (the fourth well was reported to be dry?). The status of the surrounding private wells has not been investigated with respect to existing well construction issues, quality and quantity problems as a “pre-survey”. It is recommended that a pre-survey of private wells in the vicinity be completed prior to commencement of Phase 1. This should be helpful in dealing with any well interference complaints in future.

Please contact us with any questions.

Yours truly,



Keith Sherman, Executive Director



Michelle Hudolin, Wetland and  
Habitat Biologist

CC: Sandra Mattson