



Severn Sound Environmental Association

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September 27, 2019

Shawn Persaud
Director of Planning & Development
Corporation of the Township of Tiny
130 Balm Beach Road West
Tiny ON L0L 2J0

Dear Mr. Persaud,

RE: Review of CRH Response to the Township's Objection Letter of March 25, 2019 for Proposed Teedon Pit Extension, Township of Tiny

In response to your request on August 2, 2019, the Severn Sound Environmental Association (SSEA) has reviewed the following documents:

- CRH Canada Group Inc.'s June 20, 2019 response (hereafter referred to as Response Letter) to the Township's objection letter of March 25, 2019.
- Goodban Ecological Consulting Inc.'s June 21, 2019 memorandum response to SSEA/Township comments on Significant Wildlife Habitat (hereafter referred to as SWH Memo).

The SSEA offers the following comments on the Natural Environment portion of the above responses.

Response Letter item #9

The letter states that "*MNRF is satisfied with the work related to Species at Risk as it relates to the Endangered Species Act with the exception of whip-poor-will surveys. CRH has committed to do the whip-poor-will surveys this spring/early summer and provide the survey results to MNRF.*"

1. Documentation that confirms that the Ministry of Natural Resources and Forestry (MNRF) is satisfied with the SAR work (excluding 2019 whip-poor-will surveys) should be provided for the Township's files.
2. The SSEA defers to the Province on Species At Risk (SAR) and the Endangered Species Act. The Ministry of Environment, Conservation and Parks (MECP) is now the ministry responsible for SAR, and the 2019 whip-poor-will information will need to be reviewed by MECP rather than the MNRF.

Response Letter item #10

3. Sufficient additional information and clarification was provided in the SWH Memo with respect to potential Significant Wildlife Habitat, both Amphibian Breeding Habitat (Woodland) and Woodland Area-Sensitive Bird Breeding Habitat, namely:
 - a. Pond B is too small to be considered a candidate SHW for amphibian breeding, and Pond C is more than 283 m from the proposed extraction area, and swamp community SWDM4a is too ephemeral to support amphibian breeding, and thus no amphibian breeding woodland SWH is within the proposed extraction area.
 - b. The habitat, age and woodland composition in the vicinity of breeding bird survey Point Count Stations 3 and 4 was clarified. It was confirmed that these areas are predominantly coniferous plantation and do not contain “mature, closed canopy forests with multiple vegetation strata” and thus do not qualify as SWH for woodland area-sensitive breeding birds. However it should be noted that these areas are still within the area that the consultant identified as ‘Recommended Significant Woodland Boundary’.

Response Letter item #11

4. SSEA is satisfied with the response that CRH will commit to adding a note to the Operation Plan, provided that the word “should” is changed to “shall” in the proposed note, i.e.: “The forest edge management zones shall be monitored for survival in the first, second and fifth years after planting. Replacement planting shall be undertaken if survival is less than 60% for each species.”

Response Letter item #12

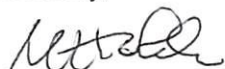
5. SSEA is satisfied with the response that CRH commits to modifying note #7 on the Rehabilitation Plan to include survival assessment at year five (5) in addition to years one (1) and two (2), and that the note will be modified to require 60% survival of each species.

Response Letter item #13

6. The response states “*Management plans for trees to be removed is not beneficial to the site*”. If tree removal within the next few years, this may have more validity than if extraction and tree removal is not for many years. If trees are to remain for decade(s), then standard forest management best practices could be used in the meantime for a variety of reasons, such as: management of invasive species to reduce their off-site impacts; improving biological diversity, and; providing habitat prior to removal of the woodland.
7. SSEA is satisfied with respect to the revision to note #4 on the Rehab Plan “...or other appropriate species recommended by a qualified ecologist at the time of planting”.

If you have any questions, please contact me.

Sincerely,



Michelle Hudolin
Wetlands & Habitat Biologist