



Environmental Assessments & Approvals

June 27, 2025

AEC 23-226

Rayville Developments (Legacy) Inc.

Attention: Andy Kidd

Re: **Interim Field Program Summary for Linksview Subdivision Scoped Environmental Impact Study Update – Natural Heritage Peer Review Comments, Part of Lot 43, Concession 11 (780 Tenth Line), Town of Collingwood**

Andy Kidd:

Azimuth Environmental Consulting, Inc. (Azimuth) has reviewed natural heritage peer review comments prepared by Natural Resource Solutions Inc. (NRSI) on behalf of the Town of Collingwood (the “Town”) with respect to the Scoped Environmental Impact Study (EIS) Update prepared for a redline revision to an approved draft plan of the Linksview Subdivision on Part of Lot 43, Concession 11 (also referred to as 780 Tenth Line) in the Town of Collingwood. The original EIS submission was prepared by Azimuth on December 17, 2014, and the Scoped EIS Update was prepared on May 2, 2024. Peer review comments relating to the Scoped EIS Update submission were prepared by NRSI in a letter dated November 5, 2024 and are the subject of the responses/updates below.

The purpose of this letter is to provide an interim field program update regarding supplementary environmental field studies being undertaken by Azimuth in spring-summer 2025, such that the Town remains informed of ongoing efforts to provide a comprehensive response to natural heritage peer review comments prepared by NRSI. The sections below describe additional field studies being undertaken in 2025, and high-level results of studies completed to date. Detailed results of additional field surveys and associated assessments with regard for redline draft plan of subdivision materials will be presented in full as part of a future EIS Addendum, to be prepared following the conclusion of supplementary field studies in summer 2025.



Supplementary 2025 Field Program

Characterization of Vegetation Communities

Azimuth acknowledges NRSI's comment regarding timing of vegetation studies, that a single-season botanical inventory in early fall (October 4, 2023) may not have adequately captured the suite of vegetation species with potential to occur on the property. Azimuth completed a subsequent spring vascular plant inventory on May 28, 2025 in an effort to compile a comprehensive list of plant species onsite, including potential occurrences of Species at Risk (SAR) protected under Ontario's *Endangered Species Act*, 2007 (ESA), or other plant species of conservation concern (e.g. S-Rank 1-3).

No additional/previously unidentified plant SAR or other species of conservation concern were identified during the supplementary spring 2025 plant survey (note: previously-identified Butternut (*Juglans cinerea*) are discussed below). Azimuth is of the opinion that in combination with the October 4, 2023 study, the expanded vascular plant inventory suitably captures the suite of flora that occurs on the property.

Habitat for Endangered or Threatened Species

With regard for matters related to SAR, Azimuth emphasizes that ESA permissions and approvals are a proponent-driven process, and it is the responsibility of the applicant to confirm conformity in accordance with MECP requirements. In cases where the proponent is confident that negative impacts to SAR will not occur as a result of a proposed development, there is no requirement to directly engage MECP with regard for permissions or approvals, as MECP does not provide Letters of Advice or routinely "sign off" on development applications.

Regardless, Azimuth completed a comprehensive inventory for bat habitat "snag" trees on April 24, 2025 during the "leaf-off" period when cracks/splits/cavities that have potential to provide access for roosting bats are most readily identified. The results of the bat snag inventory indicated that snags were present throughout the woodland (FOD5-8/FOD3-1) feature on the property, but were most concentrated within interior sections of the eastern (FOD3-1) portion of the feature. Based on the proposed draft plan of subdivision associated with the application, minor woodland removals will occur near the southwest corner and eastern edge of the woodland where snags occurred at a low density, suggesting that impacts to roosting habitat for SAR bats will occur in portions of the woodland with the most limited capacity for bat habitat function. A fulsome review of potential impacts to SAR bats and associated mitigation measures will be included in a future EIS Addendum following completion of supplementary field studies.

With regard for the demolished dwelling on the property, Azimuth is unable to comment on whether SAR bats were harmed or killed during the activity as bat exit studies were not completed. As stated



in NRSI's comment, Azimuth identified the structure as having low potential to support bat maternity roosting habitat.

With regard for Butternut (Endangered under the ESA), four (4) live stems were identified during Azimuth's 2024 field program. A Butternut Health Assessment (BHA) will be conducted in early summer 2025 to determine whether stems are retainable and therefore whether they receive protection under the provincial ESA. The results of the BHA and subsequent recommendations will be included in the future EIS Addendum.

Species of Conservation Concern and Significant Wildlife Habitat

Azimuth acknowledges the received comments regarding potential incorporation of mitigation techniques to avoid negative impacts to Monarch through techniques such as planting/seeding of Common Milkweed (*Asclepias syriaca*) and Bat Maternity Colonies through installation of bat boxes or other compensation. Following detailed review of supplementary data collection and impact assessment based on the updated plan of subdivision, Azimuth will review and provide recommended measures for accommodating species of conservation concern and Significant Wildlife Habitat, such that negative impacts can be mitigated or offset. Rationalization for why other species-specific surveys were not completed (*e.g.* snake visual encounter surveys, insect surveys) will also be provided in the future EIS addendum.

With regard for additional recommended amphibian studies, Azimuth is in the process of completing an evening amphibian call study based on three (3) site visits (late-April, late-May, late-June) in accordance with Great Lakes Marsh Monitoring Protocol (2009) methodology. At this time the late-June site visit remains outstanding, however upon collection of a fulsome field dataset Azimuth will review field data in accordance with criteria outlined in provincial guidance documents to determine whether areas of standing water meet minimum thresholds to be considered Significant Wildlife Habitat. In regards to NRSI's relevant comment, it is notable that Western Chorus Frog was not documented on the property during Azimuth's early-spring amphibian breeding survey.

Woodlands

Woodland boundaries will be refined through delineation of the dripline using GPS technology as part of the future EIS Addendum, however there is no expectation this exercise will substantially change the limits of the mapped feature as reported in the Scoped EIS Update.

As recommended in NRSI's peer review letter, the future EIS Addendum will include additional discussion/considerations regarding mitigation of impacts to woodland, particularly as it relates to locations where residential yards will abut or encroach upon existing woodland edges. Azimuth



agrees that implementation of an Edge Management Plan and related mitigation would assist in limiting impacts to the retained woodland feature.

Tree Impacts

Although it is recognized that the results of a Tree Inventory and Preservation Plan may corroborate information presented in the Scoped EIS Update and future EIS Addendum, implementation of such plan is outside of the scope of natural heritage matters and is expected to be coordinated by others.

Wetlands and Watercourses

Azimuth will liaise with Nottawasaga Valley Conservation Authority (NVCA) to determine applicability of *Ontario Regulation 41/24* as it relates to minor wetland units on the property. It is acknowledged that NVCA may request to delineate/stake wetland boundaries onsite.

A future EIS Addendum may consider potential indirect impacts to offsite hydrological features through a post-development water balance, noting this will occur when site design is appropriately advanced.

Additional Recommendations

Additional recommendations described in NRSI's peer review letter will be considered and implemented where deemed suitable, as part of a future EIS Addendum.

Closure

We trust that the above provides an adequate field program description and interim summary of results, to be comprehensively detailed in coordination with appropriate mitigation measures as part of a future EIS Addendum. If you have any questions, please do not hesitate to contact the undersigned.

Yours truly,
AZIMUTH ENVIRONMENTAL CONSULTING, INC.

Dan Stuart, M.Env.Sc.
Ecology Lead/Partner