



May 23, 2025

BEL 225033

Taylor Elgie
Director of Planning
5 Humphrey Drive
Seguin, ON P2A 2W8

Re: Environmental Impact Study - Peer Review - Rosseau Springs Environmental Impact Study, Township of Seguin

Dear Mr. Elgie:

Beacon Environmental Limited (Beacon) has completed a review of the above captioned Environmental Impact Study (EIS) dated January 2025 prepared by FriCorp Ecological Services (herein referred to as the consultant) for the property identified as Rosseau Springs, within the Township of Seguin (herein referred to as the "subject property"). The 2025 FriCorp EIS subject to peer review will herein be referred to as 'the report', or EIS. We are pleased to provide you with our following findings and recommendations.

The primary objective of the peer review was to assess whether the report has:

- Adequately described the subject property from an ecological perspective;
- Appropriately identified natural heritage features and ecological functions that warrant protection in the context of the relevant natural heritage policy framework; and
- Identified appropriate mitigation measures while conforming with the applicable natural heritage policies.

Beacon has provided a summary of primary issues, as well as additional comments and recommendations within each comment.

Project Introduction

For the purposes of this peer review, and as mentioned in the EIS, the cumulative subject property includes three parcels of land with frontage on Maplehurst Road, Highway 632 and Little Morgan Bay Road, totalling 110 hectares or 271 acres of land. The subject property is predominantly wooded, with several wetland units, rock barrens and drainage features. Lake Rosseau is situated south of the subject property; however, it does not front onto the lake at any point.

The report authors and project team implemented the Conservation Design approach to development, whereby detailed field investigations are first completed and are then followed by the creation of a

proposed development plan, informed by the establishment of primary and secondary conservation areas. The applicant has depicted the proposed creation of 49 rural residential lots.

In addition to the EIS under review, Beacon also reviewed the Provincial Planning Statement (PPS 2024), and Seguin Township Official Plan (2006). It is our understanding that the applicant is seeking an Official Plan Amendment (OPA) to expand the current settlement boundary and that this submission will form part of a Planning Act application.

EIS Comments

Based on our review of the EIS in the context of the applicable natural heritage policies and background data review, we provide the following assessment and recommendations.

Key Comments

This section identifies primary issues encountered. Beacon has grouped comments into sections associated with methodology, findings, and impacts and mitigation below. The resolution of these comments is recommended to:

- Appropriately describe and protect the natural features and their associated functions; and
- Ensure conformity and compliance with the intent of the applicable policies and regulations.

1. Methodology

- a) Field data cited in the report is from 2021 and 2022. Given the size and complexity of the study area, it is suggested that field investigations are updated to provide current information, particularly where potentially regulated species could occur.
- b) Appendix E does not indicate effort for each survey. Understanding that surveys are often completed concurrently, the effort for each targeted survey should be more clearly indicated. Beacon recommends the preparation of a table outlining the chronological field surveys that have been completed so the amount of effort devoted to each taxonomical group is clear.
- c) A clearly outlined methodology section is not included in the report. Beacon recommends the preparation of a clear methodology section on the protocols implemented for each taxonomical survey completed. This methods section should be separate from the introduction of any field findings or analysis.
- d) It is unclear if breeding bird surveys were completed. Appendix E notes avian surveys, however as noted above, the methodologies are not described in adequate detail. Beacon recommends early morning roving surveys be completed throughout the subject property to assess the avian communities, including regulated species such as Red-headed Woodpecker (*Melanerpes erythrocephalus*) and others to expand the discussion of Significant Wildlife Habitat (SWH) and policy conformity.
- e) It is unclear if amphibian call surveys were completed. Amphibian surveys should be conducted, including three evening surveys using the Marsh Monitoring Protocol (MMP) on wetlands within the subject property, as well as salamander egg mass surveys within vernal pools.

- f) It is unclear if aquatic habitat assessments were done and how the thermal and flow regime of the watercourses and streams on the subject property were determined. Please clarify and provide a discussion of thermal and flow regime of the watercourses.
- g) Table 3 (*Environmental Conditions During Snake Surveys, 2022*) does not include the survey time and duration. Beacon recommends the EIS be revised to include this information to convey the effort dedicated to snake surveys.
- h) Figure 99 (*Snake Survey Locations*) depicts 7 snake survey stations; however, 10 stations are noted within the report and Table 3. Please clarify this discrepancy. It also appears the large rock barren in the northeastern portion of the subject property was not included as a survey station. All rock barrens should be visited for reptile surveys to appropriately understand potential impacts.
- i) It is unclear how current the background information is such as iNaturalist or e-Bird records. Please include the dates the most recent background sources were accessed and revise the search to include current records if appropriate.

2. Findings

- a) The size and resolution of the graphics provided throughout the report are difficult to interpret given the size and complexity of the subject property. Beacon recommends that a revised report include figures on aerial orthoimagery at an appropriate scale and resolution. Scale bars should be included for ease of reference and the authors should explore graphically separating portions of the property into quadrants so visual detail is not lost as is at the present scale.
- b) Beacon recommends that additional justification should be provided as to why non-wetland forested areas are not designated as conservation areas.
- c) Beacon recommends that all communities and ecosites that are described in the report include representative botanical species from the canopy, lower and ground vegetation layers, where present. This is particularly important for communities where the determination of upland or wetland is less clear (i.e. ecosite G123Tt), and for those that occupy larger areas on the landscape or occur in multiple locations. There are several vegetation types in the report that do not include this information.
- d) A botanical inventory was not included. A two-season botanical inventory should be collected and provided, with particular attention to species that are within the proposed removal areas.
- e) It is not clear which amphibians were detected on the property and those that are assumed to be present. Figure 104 and 105 present unidentified amphibian egg masses. These likely belong to a species of Spotted Salamander and should be included in the SWH analysis. A more detailed discussion on potential amphibian species on site should be included.
- f) A search for Pileated Woodpecker (*Drycopus pileatus*) nesting cavities should be completed within the proposed removal footprints, along with clarifying the potential presence of any other Schedule 1 birds under the Migratory Bird Regulation (MBR).
- g) The wetland limits of community G22rTt-3 appear to extend further northwest than indicated in the report, based on aerial imagery. Beacon recommends confirmation of the limits of the G22rTt-3 wetland.
- h) The SWH assessment should be updated following the completion of additional surveys noted in this review. Beacon recommends a figure be prepared to indicate where SWH is present on the subject property.
- i) The breeding bird community presented in Appendix F lacks the numbers of territories as well as status and ranks. Beacon recommends that Appendix F be updated to include provincial and local rankings, including COSSARO, S-ranks and provincial area-sensitivity at minimum. Beacon also recommends that species with elevated sensitivity or those with

status under the *Endangered Species Act* (ESA) should be provided on a figure, including Canada Warbler (*Cardellina canadensis*).

3. Impacts and Mitigation Measures

- a) Beacon recommends a discussion on policy prescribed feature setbacks should be included in the report (i.e. Figure 10 references stream and rock barren setbacks and Figure 62 references industry standard without policy reference), clearly linking the features on site to specific sections and policies in the applicable documents. Specific policy numbers should be explicitly referenced where appropriate.
- b) Beacon recommends that report graphics be provided in higher resolution to clearly indicate feature limits (discussed above) as well as prescribed setbacks and clear red areas where encroachments are proposed into the prescribed setbacks. These areas should be quantified in the text and shown graphically to facilitate review.
- c) Additional clarification is required with respect to communities without setbacks, and those where varying buffers are applied (5 m, 15 m or 30 m is applied on wetlands or streams, as well as 15 m vs. 30 m on rock barrens), as this is not clear from the report. The source and suitability of the 5 m stream setback is also not clear, and Beacon recommends further clarification regarding setbacks.
- d) The impacts and mitigation sections of the report should be collaborative in nature and reference applicable companion reports prepared by other members of the consulting team where appropriate.
- e) Appendix B notes the presence of a porcupine den identified during preliminary work however this is not discussed or revisited in the EIS. Beacon recommends confirmation of the location of the suspected or identified den and include in the impact and mitigation discussion.
- f) Wetland encroachments and buffer reductions need to be clearly quantified, visualized and discussed. Beacon recommends lot lines should be adjusted to respect 30 m on wetlands where possible and proposed reductions need to be justified with policy and a net impact discussion.
- g) In relation to comment 2h above, Beacon recommends that the lot lines of lot 37 be revisited to minimize buffer reductions in this location given the sensitivity of that ecosite and the possibly larger feature area than shown.
- h) Beacon recommends the lot line encroachments at the rear of lots 3, 4 and 5 be revised, where possible, to ensure adequate protection to the wetland.
- i) A discussion on wetland water balance should be included in the report and reference the appropriate hydrogeological report, if undertaken. A high-level discussion should be included regarding the pre and post construction conditions, and link to the noted stormwater management measures to promote infiltration.
- j) Appendix B notes a 30 m buffer to rock barrens during the preliminary investigations which has been reduced throughout the EIS. Beacon recommends additional justification to speak to why the rock barren setback is appropriate and how impacts to rock barrens and associated wildlife is being addressed, particularly with lots 45, 46 and 47 where reptile surveys did not occur.
- k) A discussion on roadway impacts and mitigation should be included given the proposed increase in traffic on existing roads as well as the introduction of new roadways through and adjacent to natural features, particularly to herpetofauna.
- l) Beacon recommends that the locations of the three crossings that were discussed with DFO should be clearly indicated on a figure.

- m) Beacon recommends the exploration of alternate options for the roadway connecting lot 42 to lots 38-41. Can it be eliminated to avoid wetland removal? Is it possible for these lots to front onto Little Morgan Bay Road instead of through the swamp?
- n) Beacon recommends that FRiCorp confirm and indicate if lot 47 respects the tree protection zone of the mast producing tree SWH area adjacent and confirm that no mast tree removal is proposed.
- o) Beacon recommends that FRiCorp revisit potential impacts on the ephemeral stream north of lot 48 and 49 and consider reducing lot depth for protection.

4. Regulated Species Under the *Endangered Species Act*

Consultation with the MECP should be undertaken to review the field study methods and ensure that the extent of development and the findings are being appropriately interpreted to uphold the ESA and ensure the proponent does not contravene this legislation.

We note that the authors describe both Massasauga (*Sistrurus catenatus*) and Eastern Hog-nosed Snake (*Heterodon platirhinos*), among others, as confirmed absent based on surveys completed. We caution the usage of this language particularly with respect to the Eastern Hog-nosed Snake which is notoriously difficult to detect, and provincial experts posit there is no threshold of surveys one can complete to effectively confirm absence. The applicant should discuss this with MECP given the site location and possible known records in the vicinity.

Additional Comments

- Sections and headings within the report should be numbered to facilitate cross referencing in the report and overall readability.
- Scientific names should be referenced throughout the body of the report, in conjunction with common names, to provide greater clarity as to species being discussed as common names can vary locally.
- Page 16 notes the Rosseau Springs ownership group will retain and maintain the lands outside of the proposed development. Beacon recommends that FRiCorp clarify what is meant by “maintain the lands outside of the proposed development”.
- No reference is provided for the preliminary report within Appendix B. Please provide.

Recommendations and Conclusion

To address the key issues noted within this peer review, Beacon recommends the preparation of a revised report with updated fieldwork, and analytical updates discussed above.

Please contact the undersigned for further clarification of comments or should additional discussion be required.

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