

February 18, 2025

BEL 220352

John Perciasepe
Highglen Homes Limited
10148 Warden Avenue
Markham ON
L6C 1N3

**Re: Environmental Impact Study - Response Matrix Covering Letter
230 Finch Avenue, City of Pickering**

Beacon Environmental Limited (Beacon) has been retained by Highglen Homes Limited to prepare an Environmental Impact Study (EIS) in relation to the proposed re-development of 230 Finch Avenue in the City of Pickering, Regional Municipality of Durham. This property is herein referred to as the subject property.

The original EIS prepared by Beacon was dated December 2021 and a revised EIS was issued in April 2024, following revisions to the application. Comments were provided by the Toronto and Region Conservation Authority (TRCA) on July 31, 2024 and noted that the previously issued comments were primarily addressed or are now deferred to the municipality as the commenting authority. R.J. Burnside was retained on behalf of the City as peer reviewer and provided comments on November 14, 2024. Additionally, a memorandum was received from Rouge National Urban Park (RNUP) on behalf of Parks Canada (PC) on August 16, 2024. A revised version of the EIS, dated February 2025 has been prepared in response to all of these comments.

Additional discussion is provided herein specific to comments received from Parks Canada related to mitigation. These should be reviewed in tandem with the revised EIS.

We note that Parks Canada's comments were not anticipated given the timing of project initiation and the original regulatory correspondence (2020) and confirmation of project scoping. Additionally, this application represents the third submission on the file and no comments or correspondence was previously received from Parks Canada. Beacon engaged with the TRCA in 2020 to confirm the work plan and scope of the EIS, which was completed thereafter to inform the first submission in accordance with their approval. No additional field studies were deemed necessary at that time.

In their letter, Parks Canada noted several mitigation measures including those pertaining to wildlife and vegetation, equipment operations, erosion and sediment control, along with hazardous material management and site clean-up.

A number of more specific mitigation measures are described under each of these categories, and those pertaining to wildlife and vegetation are restated here:

- 1. Conduct vegetation clearing, grubbing, and tree removal before April 1st or after November 15th to minimize impacts to wildlife.*

This request extends the usual window for vegetation clearing primarily to accommodate bats and Milk Snake, however the EIS addresses all regulated species and no Milk Snake were observed on the subject property. Regardless, the proponent agrees to this request, and the EIS has been updated accordingly, effectively extending the no vegetation removal date from August to mid-November.

2. Please also note that clearing of vegetation and grubbing does not guarantee that some species will not nest in the area (i.e. in bare soil), and workers should be aware of wildlife that may enter the site at any time and attempt to nest between April 1-August 31.

This is already noted in the EIS.

3. The site should be fully fenced off with wildlife-proof fencing to avoid wildlife injury or mortality.

It is our understanding that the site will be protected with silt fencing during construction. It is impractical to “fully” fence the suite off as there will be constant ingress and egress.

Post construction, adjacent developments to the east and west chain-link fencing installed along the rear lot line, which is what is proposed in the EIS. Additional wildlife-proof fencing in the rear of these properties would not achieve the function of wildlife exclusion given this represents a very small portion of the feature boundary which extends off-site. The EIS recommends chain-link fencing in accordance with the City’s requirements that is consistent with fencing in the immediate vicinity, it is our professional opinion that this is appropriate in this situation.

4. If work is to occur within bird or turtle nesting seasons, the site must be surveyed using established protocols by a qualified wildlife biologist prior to work starting. Parks Canada would like to be informed of the results of the survey.

The timing of vegetation removal mitigation measures will be adhered to per comment #1 above and therefore the clearing of vegetation will take place outside of the avian and turtle nesting windows.

5. If active nests, dens or roosts are discovered, work cannot proceed within established buffer distances from these nests. Contact Parks Canada for species-specific buffer distances.

If an active nest is found during the construction process, the proponent will be required to adhere to the *Migratory Bird Convention Act*, *Migratory Bird Regulation* and *Fish and Wildlife Conservation Acts*. This is already addressed in the EIS.

6. On-site workers should receive wildlife awareness training.

We do not believe this is required given the very low risk of interaction.

7. When possible, conduct activities during daylight hours, avoiding critical foraging times (dusk and dawn). Consult with Parks Canada staff for site-specific advice.

It is our professional opinion that the functions and attributes of the land immediately adjacent to the development site, with the buffers in place, do not require this change. However, the proponent has agreed to this request and this is reflected in the updated EIS.

8. Minimize the time excavations remain open and cover or fence when left unattended to reduce the potential for wildlife injury.

We do not believe this mitigation measure is necessary beyond the usual health and safety requirements related to open excavations.

9. *Never approach or harass wildlife (e.g., feeding, baiting, luring). If wildlife is observed at or near the work site, allow the animal(s) the opportunity to leave the work area.*

This has been inserted into the revised EIS as a recommendation.

10. *Designated Parks Canada staff are available to assist with any potential wildlife conflict (e.g., aggressive behaviour, persistent intrusion), distress or mortality.*

Acknowledged.

11. *A site specific Erosion and Sediment Control Plan is required due to the proximity of Petticoat Creek.*

This is being addressed by Valdor, the project engineers, in the comment response matrix.

12. *Schedule work to avoid wet, windy and rainy periods or very dry periods that may increase erosion and sedimentation.*

This would be part of the ESC plan, see response to (11).

13. *A Spill Response Plan should be developed prior to work starting.*

This will be addressed by Valdor the project engineers.

We trust this is sufficient for your needs at this time and look forward to working with you as this application proceeds. Please let us know if anything further is required from our team.

Prepared by:
Beacon Environmental Ltd.



Chana Steinberg, BSc. (Hons.),
Senior Ecologist

Reviewed By:
Beacon Environmental Ltd.



Brain E Henshaw, CEO,
Senior Ecologist